State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LUCAS COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01441
Fac ID: 0448002099
DATE: 4/20/2006

Tencon, LTD
Robert DiSanza
7134 Railroad Street
Holland, OH 43612

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **TDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 4/20/2006**
Terms and Conditions	**Effective Date: 4/20/2006**

FINAL PERMIT TO INSTALL 04-01441

Application Number:	04-01441
Facility ID:	0448002099
Permit Fee:	**$4000**
Name of Facility:	Tencon, LTD
Person to Contact:	Robert DiSanza
Address:	7134 Railroad Street Holland, OH 43612

Location of proposed air contaminant source(s) [emissions unit(s)]:
7134 Railroad Street
Holland, **Ohio**

Description of proposed emissions unit(s):
2 resin paste mixers and 11 pultrusion lines.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	72.67
VOC	67.9
PE	0.2
HAP (individual)	9.9
HAP (total)	24.9

Emissions Unit ID: **P001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
Resin Paste Mixer 1	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-11(B)

Applicable Emissions Limitations/Control Measures
Organic compound (OC) emissions, excluding emissions from non- photochemically reactive clean-up materials, shall not exceed 1.62 lbs/hr, 38.88 lbs/day and 7.09 tons/year.
See section A.2.b below.
Particulate emissions (PE) shall not exceed 0.024 lb/hr and 0.1 ton/year.
Visible emissions (VE) shall not exceed 0% opacity as a 6-minute average.
OC emissions from clean-up materials from all emissions units at this facility shall not exceed 792 lbs/month and 4.75 tons/year.
See section B.1 below.
See section B.2 below.
See section A.2.a below.
See section A.2.a below.
See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the mixing operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant and non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

   b. the weight of each resin employed (e.g., styrene), in pounds;

   c. the OC content of each resin employed (e.g., styrene), in percent by weight;

   d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

   e. the actual number of hours that the emissions unit was in operation; and

   f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

   The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

   a. the company identification for each cleanup material employed;

   b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

   c. the volume of each cleanup material applied, in gallons;

   d. the OC content of each cleanup material applied, in pounds per gallon;

   e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

   f. the combined total OC emission rate from all cleanup materials employed at this

facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

   a. the name and identification number of each resin employed;

   b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

   c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

   d. the number of pounds of each resin employed;

   e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

   f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

   g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

   h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

   1. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions 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. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

5. The permit to install for this emissions unit [P001] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

8. The permittee shall collect and record the following information for each day for this emissions unit:

   a. whether or not the particulate control, fabric filter system was in service when the emissions unit was in operation.

9. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 1.62 lbs/hr, and the actual average hourly OC emissions for each such day;

   b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.88 lbs/day, and the actual OC emissions for each such day;

   c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

   d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

   e. an identification of each day during which an inspection was not performed by the required frequency; and

   f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

   If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control, fabric filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12

calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions 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 Toledo Division of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      1.62 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.88 lbs/day of OC, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

EM(OC) = summation of (Wi x OCi) x EF(OC)

where:

EM(OC) = OC emissions from the resin mix operations, in pounds per day;

Wi = the weight of resin mix i produced, as specified in section C.1.b, in pounds per day;

OCi = the OC content of mix i, as specified in section C.1.c, in percent by weight; and

EF(OC) = the emissions factor from AP-42 Chapter 6.4, Table 6.4-1 (1/95) for VOC emissions from mixing acrylic varnish, which is 0.01 pound per pound of available OC content.

c. Emission Limitation:

7.09 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content of the cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in

section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

0.024 lb/hr of PE

Applicable Compliance Method:

Compliance shall be based upon the following equation:

E(PE) = P x CONCsolid x EF(PE) x (1-CE)

where:

E(PE) = particulate emissions, in lb/hr;

P = maximum mix production rate, which is 440 lbs/hr as noted in the permit application;

CONCsolid = maximum solids concentration in the mix, which is 237.34 lbs fillers/440 lb batch as noted in the permit application;

EF(PE) = Emission factor of 0.01 as noted in AP-42 Chapter 6.4, Reference 4 to Table 6.4-1 (1/95); and

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using the procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.1 ton/year of PE

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.024 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission

limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

VE shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

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

i. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

j. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
Resin Paste Mixer 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions Limitations/Control Measures
Organic compound (OC) emissions, excluding emissions from non- photochemically reactive clean-up materials, shall not exceed 1.62 lbs/hr, 38.88 lbs/day and 7.09 tons/year.
See section A.2.b below.
Particulate emissions (PE) shall not exceed 0.024 lb/hr and 0.1 ton/year.
Visible emissions (VE) shall not exceed 0% opacity as a 6-minute average.
OC emissions from clean-up materials from all emissions units at this facility shall not exceed 792 lbs/month and 4.75 tons/year.
See section B.1 below.
See section B.2 below.
See section A.2.a below.
See section A.2.a below.
See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the mixing operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant and non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

   b. the weight of each resin employed (e.g., styrene), in pounds;

   c. the OC content of each resin employed (e.g., styrene), in percent by weight;

   d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

   e. the actual number of hours that the emissions unit was in operation; and

   f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

   The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

   a. the company identification for each cleanup material employed;

   b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

   c. the volume of each cleanup material applied, in gallons;

   d. the OC content of each cleanup material applied, in pounds per gallon;

   e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

   f. the combined total OC emission rate from all cleanup materials employed at this

facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

   a. the name and identification number of each resin employed;

   b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

   c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

   d. the number of pounds of each resin employed;

   e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

   f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

   g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

   h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

   i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions 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. the total duration of any visible emission incident; and

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

5. The permit to install for this emissions unit [P002] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for the entire facility:

   Pollutant: Styrene
   TLV (mg/m3): 85
   Maximum Hourly Emission Rate (lbs/hr): 15.51
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
   MAGLC (ug/m3): 2028.6

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

8. The permittee shall collect and record the following information for each day for this emissions unit:

   a. whether or not the particulate control, fabric filter system was in service when the emissions unit was in operation.

9. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the

following information:

a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 1.62 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.88 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control, fabric filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions 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 Toledo Division of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      1.62 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.88 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

EM(OC) = summation of (Wi x OCi) x EF(OC)

where:

EM(OC) = OC emissions from the resin mix operations, in pounds per day;

Wi = the weight of resin mix i produced, as specified in section C.1.b, in pounds per day;

OCi = the OC content of mix i, as specified in section C.1.c, in percent by weight; and

EF(OC) = the emissions factor from AP-42 Chapter 6.4, Table 6.4-1 (1/95) for VOC emissions from mixing acrylic varnish, which is 0.01 pound per pound of available OC content.

c. Emission Limitation:

7.09 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content of the cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000

lbs/ton.

f. Emission Limitation:

0.024 lb/hr of PE

Applicable Compliance Method:

Compliance shall be based upon the following equation:

E(PE) = P x CONCsolid x EF(PE) x (1-CE)

where:

E(PE) = particulate emissions, in lb/hr;

P = maximum mix production rate, which is 440 lbs/hr as noted in the permit application;

CONCsolid = maximum solids concentration in the mix, which is 237.34 lbs fillers/440 lb batch as noted in the permit application;

EF(PE) = Emission factor of 0.01 as noted in AP-42 Chapter 6.4, Reference 4 to Table 6.4-1 (1/95); and

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using the procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.1 ton/year of PE

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.024 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

VE shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

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

i. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

j. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-1	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in Section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the

entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P003] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-2	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.36 lb/hr, 8.72 lbs/day and 1.59 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P004] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 0.36 lb/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 8.72 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.36 lb/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

8.72 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

1.59 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-3	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.73 lb/hr, 17.44 lbs/day and 3.18 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total plantwide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P005] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 0.73 lb/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 17.44 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.73 lb/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

17.44 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

3.18 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-4	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.73 lb/hr, 17.44 lbs/day and 3.18 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the

entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P006] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 0.73 lb/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 17.44 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.73 lb/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

17.44 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

3.18 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-5	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.73 lb/hr, 17.44 lbs/day and 3.18 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P007] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 0.73 lb/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 17.44 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.73 lb/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

17.44 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

3.18 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 1-N	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P008] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 2-1	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the

entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P009] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 2-2	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P010] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 2-3	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

1. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P011] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 2-4	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.59 lbs/hr, 38.14 lbs/day and 6.96 tons/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the

entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P012] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install

prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 1.59 lbs/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 38.14 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.59 lbs/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

38.14 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

6.96 tons/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pultrusion Line 2-5	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.19 lb/hr, 4.56 lbs/day and 0.83 ton/year. See section A.2.b below. Total OC emissions from clean-up materials from the entire facility shall not exceed 792 lbs/month and 4.75 tons/year. See section B.1 below.
	OAC rule 3745-31-05(C)	See section B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.b The OC emissions from the resin bath operation consist of styrene, a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall use only non-hazardous air pollutant, non-photochemically reactive material (eg. acetone) for cleanup of this emissions unit.

2. The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons per year of total HAP, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total HAP (Tons)
1	0.83	2.1
1-2	1.66	4.2
1-3	2.49	6.3
1-4	3.32	8.4
1-5	4.15	10.5
1-6	4.98	12.6
1-7	5.81	14.7
1-8	6.64	16.8
1-9	7.47	18.9
1-10	8.30	20.0
1-11	9.13	22.1
1-12	9.9	24.9

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for individual HAP and total HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the company identification for each resin employed (e.g., styrene);

b. the weight of each resin employed (e.g., styrene), in pounds;

c. the OC content of each resin employed (e.g., styrene), in percent by weight;

d. the total OC emission rate for all resins employed (e.g., styrene), calculated as required in section E.1.b, in pounds per day;

e. the actual number of hours that the emissions unit was in operation; and

f. the average, hourly OC emission rate for all resins employed (e.g., styrene), calculated by (d)/(e), in average, pounds per hour.

The daily and hourly (average) OC emissions rates shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

2. The permittee shall collect and record the following information for each month (total facility-wide):

a. the company identification for each cleanup material employed;

b. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;

c. the volume of each cleanup material applied, in gallons;

d. the OC content of each cleanup material applied, in pounds per gallon;

e. the total OC emission rate for each cleanup material, in pounds per month, calculated as required in section E.1.d.; and

f. the combined total OC emission rate from all cleanup materials employed at this facility, in pounds per month (= usage, all is assumed to evaporate).

The monthly OC emission rate shall be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each resin employed;

b. the individual HAP[1] content for each HAP of each resin, in weight percent of individual HAP;

c. the total combined HAP content of each resin, in weight percent of combined HAPs (sum all the individual HAP contents from b);

d. the number of pounds of each resin employed;

e. the total individual HAP emissions for each HAP from all resins employed, in tons per month [for each HAP the sum of (b times d) for each resin);

f. the total combined HAP emissions from all resins, in tons per month [the sum of © times d) for each resin];

g. the updated rolling, 12-month total of the individual HAP emissions for each HAP from all resins employed, in tons; and

h. the updated rolling, 12-month total of the total combined HAP emissions from all resins employed, in tons.

i. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

4. The permit to install for this emissions unit [P013] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

the entire facility:

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 15.51
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775
MAGLC (ug/m3): 2028.6

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a an identification of each day during which the average hourly styrene emissions, excluding cleanup materials, from this emissions unit exceeded 0.19 lb/hr, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 4.56 lbs/day, and the actual OC emissions for each such day;

c. an identification of each month during which the combined OC emissions, from cleanup materials from all emissions units located at this facility, exceeded 792 lbs/month facility-wide, and the actual OC emissions from cleanup materials for each such month;

d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;

e. an identification of each day during which an inspection was not performed by the required frequency; and

f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If there are no deviations (excursions) during the calendar quarter, the permittee shall submit a statement to that effect.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and total of all HAPs and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.19 lb/hr of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.1.f.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

4.56 lbs/day of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1.b, C.1.c and C.1.d. Compliance shall be determined based upon the following equation:

E(OC) = summation of (Wi x OCi) x EF(OCi)

where:

E(OC) = OC emissions as from all resin operations (e.g., styrene), in pounds per day;

Wi = the weight of resin i employed, as specified in C.1.b, in pounds per day;

OCi = the OC content of resin i, as specified in C.1.c, in percent by weight; and

EF(OCi) = 0.04 (emission factor) for OC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)).

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

c. Emission Limitation:

0.83 ton/year of OC, excluding emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily records required in section C.1.d for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

d. Emission Limitation:

792 lbs/month of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in section C.2.f. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

EC(OC) = summation of (Vi x OCi) daily over a month

where:

EC(OC) = OC emissions from the cleanup materials, in pounds per month;

Vi = the volume of cleanup material applied, as specified in Section C.2.c, in gallons per month; and

OCi = the OC content of cleanup material i, as specified in Section C.2.d, in pounds per gallon.

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound content cleanup materials employed.

e. Emission Limitation:

4.75 tons/year of OC, from cleanup materials facility-wide

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly records required in section C.2.f for the calendar year, and then dividing this total (lbs/year) by 2000 lbs/ton.

f. Emission Limitation:

9.9 tons/year as a rolling, 12-month summation of individual HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.g.

g. Emission Limitation:

24.9 tons/year as a rolling, 12-month summation of total, combined HAP for the facility

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in section C.3.h.

F. Miscellaneous Requirements

None