

Synthetic Minor Determination and/or Netting Determination

Permit To Install 08-04633

A. Source Description

United Fiberglass of America, Inc., 0812100565, makes fiberglass conduit. Emissions units at the facility include a polyester winder (P003) and two epoxy winders with curing oven (P001 and P004). The dry cut-off saw (P002) has been withdrawn.

B. Facility Emissions and Attainment Status

The facility is located in Clark County, which is attainment for all major criteria pollutants except ozone, which is classified as basic nonattainment. Based on the allowable limit in OAC rule 3745-21-07(G)(2) and the assumption that all VOC emissions equals HAP emissions, the facility's potential to emit (PTE) for a single HAP is greater than 10 TPY (i.e., 40 lbs/day * 365 days/yr * 3 emissions units = 21.9 TPY single HAP).

C. Source Emissions

After obtaining the Synthetic Minor PTI 08-04259 and 08-04633, facility-wide potential VOC emissions are 4.03 TPY. Assuming that all VOC could potentially be emitted as a HAP, HAP potential emissions are also 4.03 TPY (single HAP and combined HAP). Individual emissions unit potential VOC/HAP emissions from P001, P003 and P004 are 1.42 TPY, 0.80 TPY and 1.81 TPY, respectively.

D. Conclusion

The terms and conditions in this Synthetic Minor Permit to Install will limit the facility to less than 10 TPY of a single hazardous air pollutant by limiting VOC emissions. Therefore, the facility is not considered a major source for Title V applicability. Potential emissions have been limited through restrictions on process weight rates and through the inclusion of appropriate monitoring, record keeping and reporting requirements



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CLARK COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04633

Fac ID: 0812100565

DATE: 11/18/2004

United Fiberglass of America Inc
Mark Holdeman
PO Box 1511
Springfield, OH 45501-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04633** FOR AN AIR CONTAMINANT SOURCE FOR
United Fiberglass of America Inc

On 11/18/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **United Fiberglass of America Inc**, located at **907 Wheel St, Springfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04633:

chapter 31 modification replacing 08-08254 issued 8/21/01 modification of P003 to increase emissions.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main, Dayton, OH 45422-1280 [(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04633

Application Number: 08-04633
Facility ID: 0812100565
Permit Fee: **To be entered upon final issuance**
Name of Facility: United Fiberglass of America Inc
Person to Contact: Mark Holdeman
Address: PO Box 1511
Springfield, OH 45501-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**907 Wheel St
Springfield, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification replacing 08-08254 issued 8/21/01 modification of P003 to increase emissions.

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

Director

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

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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

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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

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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.

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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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	0.80

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Polyester Filament Winder for making fiberglass conduit Modification*	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.24 lbs/hr and 15 lbs/day, excluding cleanup.
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)	OC emissions shall not exceed 0.80 TPY OC per rolling 12-month period, including cleanup.
	OAC rule 3745-21-07(G)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(9)(e)	See Section A.2.b. below.

2. Additional Terms and Conditions

- 2.a The 1.24 lbs/hr was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

- 2.b** The provisions of paragraph (G) of this rule shall not apply to the use, in any article, machine, equipment, or other contrivance described in paragraph (G)(1), (G)(2), (G)(3), or (G)(4) of this rule, of liquid organic cleanup materials which exhibit a boiling point higher than 200 degrees Fahrenheit at 0.5 millimeter mercury absolute pressure, or having an equivalent vapor pressure, unless such liquid organic material is exposed to temperatures exceeding 220 degrees Fahrenheit.

B. Operational Restrictions

1. The annual polyester resin usage for this emissions unit shall not exceed 9500 lbs based on a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and maintain the following information each month for all cleanup materials, except those specified in Section A.2.b., for emissions units P001, P003, and P004:
 - a. The company identification of each cleanup material employed.
 - b. The total, combined number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material, in pounds per gallon.
 - d. The total, combined organic compound emission rate for all cleanup materials, in pounds per month (for all cleanup materials, the sum of (b) times (c)).
 - e. The total, combined number of cleaning batches.
2. The permittee shall collect and maintain the following information each month for each resin component (i.e., polyester resin, resin catalyst) and cleanup material, except those specified in Section A.2.b., employed in this emissions unit:
 - a. The company identification of each resin component employed.
 - b. The total number of gallons of each resin component employed.
 - c. The organic compound content of each resin component, in pounds per gallon.
 - d. The total number of cleaning batches using cleanup materials, except those specified in Section A.2.b.
 - e. The total organic compound emission rate for polyester resin, in pounds per month (multiply the density of the polyester resin, in pounds per gallon, by the number of gallons

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of polyester resin employed, by the emission factor of 0.0995 lb styrene emitted/lb polyester resin used (Table of Unified Emission Factors for Open Molding of Composites, July 23, 2001)).

- f. The total organic compound emission rate for all resin components except polyester resin, in pounds per month (for all resin components except polyester resin, the sum of (b) times (c)).
- g. The total organic compound emission rate for cleanup materials, except those specified in Section A.2.b., in pounds per month (for cleanup materials, (C.1.d) times (C.2.d) divided by (C.1.e)).
- h. The total organic compound emission rate for all resin components and cleanup materials, except those specified in Section A.2.b., in pounds per month (the sum of (e), (f) and (g)).
- i. The total number of days the emission unit was in operation.
- j. The average daily organic compound emission rate for the resin components and cleanup materials, except those specified in Section A.2.b., i.e., (h)/(i), in pounds per day (average).
- k. The rolling, 12-month summation of organic compound emissions for all resin components and cleanup materials, except those specified in Section A.2.b., in tons.
- l. The rolling, 12-month summation of polyester resin usage, in tons (sum the monthly number of gallons of polyester resin employed for the 12-month period and multiply by the density of the polyester resin).

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the OC emissions (excluding emissions from cleanup materials) from this emissions unit exceeds the average 15 pounds of OC per day limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the polyester resin usage for this emissions unit exceeds 9500 pounds based on a rolling 12-month summation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office

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or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -
1.24 lbs/hr OC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly usage rate of the

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polyester resin (12.46 lbs/hr) by the emission factor of 0.0995 lb styrene emitted/lb polyester resin used (Table of Unified Emission Factors for Open Molding of Composites, July 23, 2001).

- b. Emission Limitation -
15 lbs/day OC

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Sections C.1. and C.2.

- c. Emission Limitation -
0.80 TPY OC per rolling 12-month period

Applicable Compliance Method -
Compliance shall be determined by summing the monthly OC emission rates for the 12-month period and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

1. * The terms for emissions unit P003 in this permit supercede those identified in PTI 08-4259 issued 8/21/2001 and represents a 0.47 ton/yr increase of OC emissions.
2. The following terms and conditions A.1 through E.1 of this PTI are federally enforceable.