



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

**RE: DRAFT PERMIT TO INSTALL**

**BUTLER COUNTY**

**Application No: 14-05915**

**Fac ID: 1409030581**

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE: 3/22/2007**

RL Industries, Inc  
Brian Linnemann  
9355 LeSaint Drive  
Fairfield, OH 45014

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, 43216-1049.

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 **\$2700** 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, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

**Synthetic Minor Determination and/or  Netting Determination**

Permit To Install: 14-05915

- A. **Source Description**  
RL Industries manufactures fiberglass components using filament winding, closed molding, spray layup and manual layup. They are permitted as a synthetic minor already but submitted this air permit to install (PTI) application to allow higher facility mass emissions, to minimize record keeping and to employ revised emissions factors.
- B. **Facility Emissions and Attainment Status**  
Most of the facility mass emissions are from the Hazardous Air Pollutant (HAP), styrene. Actual HAP emissions have been 3 to 4 tons per year (tpy) in the past but the facility anticipates an increase in production orders which will result in combined total HAP emissions nearer to 12 tpy. RL Industries is in Butler County which is non-attainment for the 8-hour ozone (VOC) standard.
- C. **Source Emissions**  
Facility wide HAP limitations will remain at 9.9 tpy for a single HAP and 24.9 tpy for total HAP emissions. All HAP mass emissions have been from styrene but the facility specifically wants to be allowed the use of other monomers. Each active emissions units employ organic compounds will have an individual allowable emission limitation of 7.3 tpy of HAP/OC/VOC mass emissions except for the blending operation which is not restricted by OAC rule 3745-21-07. The total OC allowable emissions will be 98.58 tpy. An additional 23.36 tons of OC emissions will be allowed in facility-wide cleanup material usage in emissions unit (P011) where only non-HAP, non-VOC materials, primarily acetone, will be employed.
- D. **Conclusion**  
The permittee will maintain monthly record keeping and submit quarterly reports to demonstrate compliance with the above listed mass emission limitations. The facility will remain a synthetic minor, avoiding 40 CFR Subpart WWWW and Title V permitting requirements.

**BUTLER COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05915 FOR AN AIR CONTAMINANT SOURCE FOR  
RL Industries, Inc**

On 3/22/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **RL Industries, Inc**, located at **9355 LeSaint Drive, Fairfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05915:

**Modification of PTI 14-4261 with updated emissions factors and installation of a resin mixer and plantwide cleanup.**

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.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**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 14-05915**

Application Number: 14-05915  
Facility ID: 1409030581  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: RL Industries, Inc  
Person to Contact: Brian Linnemann  
Address: 9355 LeSaint Drive  
Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**9355 LeSaint Drive  
Fairfield, Ohio**

Description of proposed emissions unit(s):  
**Modification of PTI 14-4261 with updated emissions factors and installation of a resin mixer and plantwide cleanup.**

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

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Chris Korleski  
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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 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

<u>Pollutant</u>	<u>Tons Per Year</u>
HAPs	9.9 for a single HAP 24.9 for total HAP
Organic Compounds	98.58
PE/PM10	0.44
VOC	75.28

**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 - (P001) - Filament Winding Equipment with Resin Bath**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC

rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.

2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and the supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

#### **F. Miscellaneous Requirements**

1. The terms and conditions of this Permit To Install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

## 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 - (P002) - Spray Resin Layup on Dry Filament Winding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

### 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry

Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
  3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
    - a. the company identification for each coating (resin and gel coat) employed;
    - b. the amount of each coating (resin and gel coat) employed, in pounds;
    - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
    - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
    - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
    - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
    - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

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

- a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
- b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

## **E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitations:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit To Install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P003) - Spray Resin Layup on Taped Filament Winding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule

3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.

2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

#### **F. Miscellaneous Requirements**

**RL Industries, Inc**

**PTI Application: 14-05915**

**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

**Emissions Unit ID: P003**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P006) - Gelcoat Application**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC

rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.

2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emissions limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

#### **F. Miscellaneous Requirements**

**RL Industries, Inc**

**PTI Application: 14-05915**

**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

**Emissions Unit ID: P006**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P007) - Vacuum Assisted Resin Transfer Molding 1**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC

rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor of 0.02 lb emitted per lb employed) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.

3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per day [for each HAP the product of (b) times (c) times the emissions factor of 0.02 lb emitted per lb employed];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emissions limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

#### **F. Miscellaneous Requirements**

**RL Industries, Inc**

**PTI Application: 14-05915**

**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

**Emissions Unit ID: P007**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P008) - Assembly and Manual Resin Application**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC

rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin, gel coat and adhesives), in pounds per day [ the summation of (b/2000 pounds/ton) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day For adhesives, the emission factor is 0.05 lb emitted / lb OC used].

[Note: The coating/adhesive information must be for the materials as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.

2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, (resin, gel coat and adhesives), in pounds per day [the summation of (b x c) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day. For adhesives, the emission factor is 0.05 lb emitted / lb HAP used].;
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other

approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and

- b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

- 2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
- 4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

- 2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
- 3. Compliance with the HAP emissions limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P009) - Vacuum Assisted Resin Transfer Molding 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).  See term and condition B.1.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations, except for volatile organic compound emissions as stated in term A.2.c.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources,

combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating (resin or gel coat) employed;
  - b. the amount of each coating (resin or gel coat) employed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
  - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [ the summation of (b x c) x (emission factor of 0.02 lb emitted per lb employed) for all resins and gel coats employed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.

3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per day [for each HAP the product of (b) times (c) times the emissions factor of 0.02 lb emitted per lb employed];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Page 44 of 50

**RL Industries, Inc**

**PTI Application: 14-05915**

**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

**Emissions Unit ID: P009**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emissions limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.

**RL Industries, Inc**

**PTI Application: 14-05915**

**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

**Emissions Unit ID: P009**

2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P010) - Cowles Resin Mixer**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 132.5 pounds per day and 24.18 tons per year.  The requirements of this rule include compliance with OAC rule 3745-31-05(C).
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 4.10 pounds per hour.
OAC rule 3745-31-05(C)	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations listed in term A.1.
- 2.b The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air

contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter (PM) and particulate matter less than 10 micron in diameter (PM10) emissions from this air contaminant source because the calculated annual emission rate for PM and PM10 is less than ten tons per year.

## **B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each resin mixed;
  - b. the amount of each resin mixed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each resin; and
  - d. the total organic compound emission rate from all resin, in pounds per day [the summation of (b x c) x (emission factor of 0.005 lb emitted per lb of OC mixed) for all resins mixed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]

2. The permittee shall summarize the emissions from the records maintained in term C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each resin mixed;
  - b. the amount of each resin mixed, in pounds;

- c. the HAP content, recorded in percent weight, of each resin;
- d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the summation of (b x c) x (emission factor of 0.005 lb emitted per lb of HAP mixed) for all resins mixed during the day];
- e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
- f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
- g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

- 4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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 and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the OC emissions from this emissions unit exceeded 132.5 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of this limitation, as well as the corrective actions that were taken to achieve compliance.

2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitation:

132.5 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:

24.18 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The terms and conditions of this air permit to install supercede the terms and conditions of air permit to install number 14-04261 issued May 14, 1997.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

**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 - (P011) - Plant-wide Cleanup Materials**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 3900 pounds per month and 23.36 tons per year.

2. **Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass emission limitations listed in term A.1.

**B. Operational Restrictions**

1. The permittee shall not employ any hazardous air pollutants or volatile organic compounds in this emissions unit.
2. The permittee shall employ no photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each month for plant wide cleanup:
  - a. the company identification for each cleanup material employed;
  - b. the amount of each cleanup material employed, in pounds; and
  - c. the total organic compound emission rate from all cleanup materials.

These records shall be summarized at the end of each calendar year.

2. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were 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

and supplemental information after submittal of 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ug/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 28285

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

## D. Reporting Requirements

1. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of the use of any photochemically reactive materials, any HAP materials or any volatile organic compound materials in this emissions unit. If no deviations occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:

3900 lbs/month of OC emissions and 23.36 tpy from cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit To Install supercede the terms and conditions of Permit To Install 14-04261 issued May 14, 1997.

SIC CODE 3089 SCC CODE 3-08-00-799 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Filament Winding Equipment with Resin Bath

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	1.04 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-730 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Spray Resin Layup on Dry Filament Winding

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	1.04 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-730 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Spray Resin Layup on Taped Filament Winding

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	1.04 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-722 EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION Gelcoat Application

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	0.93 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-736 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Vacuum Assisted Resin Transfer Molding 1

DATE INSTALLED 1996

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	0.93 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-723 EMISSIONS UNIT ID P008

EMISSIONS UNIT DESCRIPTION Assembly and Manual resin Application

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	0.43 lb/hr	1.04	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-736 EMISSIONS UNIT ID P009

EMISSIONS UNIT DESCRIPTION Vacuum Assisted resin Transfer Molding 2

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	0.43 lb/hr	0.93	8.0 lb/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

SIC CODE 3089 SCC CODE 3-08-00-720 EMISSIONS UNIT ID P010

EMISSIONS UNIT DESCRIPTION Cowles Resin Mixer

DATE INSTALLED na

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	< 0.01 lb/hr	< 0.01	0.10 lb/hr	0.44
PM <sub>10</sub>	attainment	< 0.01 lb/hr	< 0.01	0.10 lb/hr	0.44
Sulfur Dioxide					
Organic Compounds	nonattainment	0.085 lb/hr	0.08	14.72 lb/hr	24.18
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is satisfied by emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: styrene

**RL Industries, Inc**  
**PTI Application: 14-05915**  
**Issued: To be entered upon final issuance**

**Facility ID: 1409030581**

SIC CODE 3089 SCC CODE 3-08-00-703 EMISSIONS UNIT ID P011  
 EMISSIONS UNIT DESCRIPTION Plantwide Cleanup  
 DATE INSTALLED na

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	nonattainment	35 lbs/day	6.42	128 lbs/day	23.36
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT is compliance with emissions limitations.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? x YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: acetone