



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

11/15/07

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77  
permit**

01-24-01-0112  
Fiber-Tech Industries Inc  
Roger Mola  
3808 N. Sullivan Road  
Building 31  
Spokane, WA 99216

Dear Roger Mola:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Central District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall  
Permit Review/Development Section  
Ohio EPA, Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Central District Office.

Sincerely,

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

cc: USEPA (electronically submitted)  
File, DAPC PIER  
Central District Office  
Kentucky



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 11/15/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 01-24-01-0112 to:
Fiber-Tech Industries Inc
2351 Kenskill Avenue
Washington Courthouse, OH 43160

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include P002 (Saw #1), P003 (Saw #2), P004 (Rodgers Saw), P009 (Trough Drying), R001 (Gelcoat), R003 (Lamination Table #1), R004 (Lamination Table #2), R005 (Lamination Table #3), R006 (Lamination Table #4), R007 (Lamination Table #5), and R008 (Lamination Table #6).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
122 South Front Street
Columbus, OH 43215
(614) 728-3778

Ohio Environmental Protection Agency

Chris Korleski
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(9))

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(10))

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.  
(Authority for term: OAC rule 3745-77-07(B))

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
  - b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
- (Authority for term: OAC rule 3745-77-07(F))*

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**20. 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.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-01)

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

1. The following emissions units contained in this permit are subject to MACT Subpart WWWW: P009, R001, R003, R004, R005, R006, R007 and R008. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting OEPA Central District Office (CDO), Division of Air Pollution Control (DAPC).

[Authority for term: 40 CFR Part 63, Subpart WWWW]

2. The following emissions unit contained in this permit is subject to MACT Subpart SS: R001. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting OEPA Central District Office (CDO), Division of Air Pollution Control (DAPC).

[Authority for term: 40 CFR Part 63, Subpart SS]

3. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

[Authority for term: OAC Chapter 3745-25]

4. The following insignificant emission units are located at this facility:

B001 - Plant 1 heater (PTI 01-2657);  
L001 - Degreaser (cold cleaner);  
R002 - Scuff adhesive application (PTI 01-2850);  
T001 - 10,000 gallon Resin Tank;  
T002 - 10,000 gallon Resin Tank;  
T003 - 10,000 gallon Resin Tank and  
T004 - 10,000 gallon Resin Tank

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

### B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P001 - Resin preparation;  
Z003 - Trough filling;  
Z005 - Edgecoat application;  
Z006 - Speed putty application and  
Z008 - Paved roadways and parking areas

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Saw #1 (P002)  
**Activity Description:** Plant 2 Sawing Operations - Saw #1

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plant 2 sawing operations controlled with a cyclone and settling chamber - Saw # 1	OAC rule 3745-31-05(A)(3) (PTI # 01-7316)	Particulate emissions (PE) shall not exceed 0.05 grain per dry standard cubic foot.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(3)	Particulate emissions shall not exceed 15.7 pounds per hour from emissions units P002, P003 and P004 combined.  See A.I.2.a and A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-17-11(A)(3), the 15.7 pounds per hour emission limitation was developed from Figure II of OAC rule 3745-17-11(B)(3) and is based upon emission tests conducted on June 28, 2007 to determine the uncontrolled mass rate of emissions (UMRE).
- 2.b The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to a cyclone and settling chamber. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
2. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. a. Emission Limitation: Particulate emissions shall not exceed 15.7 pounds per hour for emissions units P002, P003 and P004 combined.

Applicable Compliance Method: The results of the most recent compliance test shall be used to demonstrate compliance. The facility demonstrated compliance with the 15.7 pound per hour particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (3.09 pounds PE per hour).

- b. Emission Limitation: Particulate emissions shall not exceed 0.05 grain per dry standard cubic foot.

Applicable Compliance Method: The results of the most recent compliance test shall be used to demonstrate compliance. The facility demonstrated compliance with the 0.05 grain per dry standard cubic foot particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (0.0256 grain per dry standard cubic foot).

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;
- b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission limitations (lb/hr and gr/dscf);
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- d. The test(s) shall be conducted while emissions units P002, P003 and P004 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
- f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Saw #2 (P003)  
**Activity Description:** Plant 2 Sawing Operations - Saw #2

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plant 2 sawing operations controlled with a cyclone and settling chamber - Saw # 2	OAC rule 3745-31-05(A)(3) (PTI # 01-7316)	Particulate emissions (PE) shall not exceed 0.05 grain per dry standard cubic foot.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(3)	Particulate emissions shall not exceed 15.7 pounds per hour from emissions units P002, P003 and P004 combined.  See A.I.2.a and A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-17-11(A)(3), the 15.7 pounds per hour emission limitation was developed from Figure II of OAC rule 3745-17-11(B)(3) and is based upon emission tests conducted on June 28, 2007 to determine the uncontrolled mass rate of emissions (UMRE).
- 2.b The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to a cyclone and settling chamber. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
2. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. a. Emission Limitation: Particulate emissions shall not exceed 15.7 pounds per hour for emissions units P002, P003 and P004 combined.

Applicable Compliance Method: The results of the most recent compliance test shall be used to demonstrate compliance. The facility demonstrated compliance with the 15.7 pound per hour particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (3.09 pounds PE per hour).

- b. Emission Limitation: Particulate emissions shall not exceed 0.05 grain per dry standard cubic foot.

Applicable Compliance Method: The results of the most recent compliance test shall be used to demonstrate compliance. The facility demonstrated compliance with the 0.05 grain per dry standard cubic foot particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (0.0256 grain per dry standard cubic foot).

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;
- b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission limitations (lb/hr and gr/dscf);
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- d. The test(s) shall be conducted while emissions units P002, P003 and P004 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
- f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Rodgers Saw (P004)  
**Activity Description:** Plant 2 Sawing Operations - Rodgers Saw

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plant 2 sawing operations controlled with a cyclone and settling chamber - Saw # 3	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(3)	Particulate emissions shall not exceed 15.7 pounds per hour from emissions units P002, P003 and P004 combined.  See A.I.2.a and A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-17-11(A)(3), the 15.7 pounds per hour emission limitation was developed from Figure II of OAC rule 3745-17-11(B)(3) and is based upon emission tests conducted on 6/28/07 to determine the uncontrolled mass rate of emissions (UMRE).
- 2.b The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to a cyclone and settling chamber. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

2. The permittee shall submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
2. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

3. Emission Limitation: Particulate emissions shall not exceed 15.7 pounds per hour for emissions units P002, P003 and P004 combined.

Applicable Compliance Method: The facility demonstrated compliance with the 15.7 pound per hour particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (3.09 pounds per hour).

## V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission limitations (lb/hr and gr/dscf);
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. The test(s) shall be conducted while emissions units P002, P003 and P004 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1) and 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Trough Drying (P009)

**Activity Description:** Trough Drying Cabinet

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
trough drying cabinet	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day.

##### 2. Additional Terms and Conditions

- 2.a The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

##### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the trough drying operation:
  - a. The company identification for each resin employed;
  - b. The total number of times a trough is charged to the drying cabinet per hour and the size of each trough charged to the drying cabinet;
  - c. The hourly organic compound emission rate from the 98" troughs charged to the drying cabinet, in pounds, i.e., the number of 98" troughs charged per hour times the emission factor (in lbs OC/trough) from the most recent emission tests showing compliance. (The last emission tests were conducted on January 25, 2007. The emission factor for the 98" trough was 0.17 lb OC/trough.);
  - d. The hourly organic compound emission rate from the 120" troughs charged to the drying cabinet, in pounds, i.e., the number of 120" troughs charged per hour times the emission factor (in lbs OC/trough) from the most recent emission tests showing compliance. (The last emission tests were conducted on January 25, 2007. The emission factor for the 120" trough was 0.21 lb OC/trough); and
  - e. The total hourly organic compound emission rate from all troughs charged to the drying cabinet, in pounds, i.e., (c) + (d).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. In accordance with Section A.1.c.ii of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the organic compound emission limitations specified in this permit;
  - c. The following test method(s) shall be employed to demonstrate compliance with the organic compound emission limitations specified in this permit: Compliance with the 8 pounds per hour organic compound emission limitation specified in this permit shall be demonstrated through gravimetric testing. The gravimetric testing shall be consistent with the procedures and methods specified in the "Intent to Test" dated February 28, 1994;
  - d. The test(s) shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Gelcoat (R001)

**Activity Description:** Gelcoating operation controlled with primary and secondary enclosures and a catalytic incinerator

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gelcoating operation controlled with primary and secondary enclosures and a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI # 01-7475)	Organic compound emissions (from all gelcoats) shall not exceed 11.7 pounds per hour.
		Organic compound emissions (from cleanup materials) shall not exceed 3.0 pounds per hour.
		Organic compound emissions (from all gelcoats) shall not exceed 14.7 tons per year.
		Organic compound emissions (from cleanup materials) shall not exceed 13.1 tons per year.
		See A.I.2.b, A.I.2.c, and A.II.6 below.
	40 CFR Part 63, MACT Subpart WWWW	See A.2.f below.
	40 CFR Part 63, MACT Subpart SS	See A.2.h below.
OAC rule 3745-21-07(G)	See A.I.2.a below.	
40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.g below.	

##### 2. Additional Terms and Conditions

- This emissions unit is exempt from the provisions in OAC rule 3745-21-07(G) pursuant to OAC rule 3745-21-07(G)(9)(g) and the emission limitations established pursuant to OAC rule 3745-31-05 in PTI 01-7475 issued March 8, 2000.
- The catalytic incinerator controlling organic compound emissions from this emissions unit shall operate with a minimum control (destruction) efficiency of 90%.
- Organic compound emissions from this emissions unit shall be reduced overall by a minimum of 69.0%.

## 2. Additional Terms and Conditions (continued)

- 2.d** The pound per hour organic compound emission limitation for the use of gelcoat (11.7 pounds per hour) represents the maximum restricted hourly emission rate; therefore, there are no additional record keeping or reporting requirements associated with this emission limitation.
- 2.e** The secondary enclosure serving this emissions unit shall be employed whenever the emissions unit is in operation. The permittee shall not employ the powered roof ventilator in the secondary enclosure except to ensure that the styrene emission concentrations remain below the Permissible Exposure Limit required by OSHA.
- 2.f** The following emissions limitations apply to all gel coating operations at the facility:
- i. Organic hazardous air pollutant (HAP) emissions shall not exceed 267 pounds per ton of white/off white pigmented gel coating applied on a 12-month rolling average.
  - ii. Organic HAP emissions shall not exceed 377 pounds per ton of all other pigmented gel coating applied on a 12-month rolling average.
- 2.g** Table 15 to subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- 2.h** The facility is subject to the applicable requirements of 40 CFR Part 63, Subpart SS, "National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process".

## II. Operational Restrictions

1. This emissions unit shall not operate more than 8 cycles per hour and shall not employ more than 480 pounds of gelcoat per hour. A cycle shall include all process steps from the lowering of the hood until the raising of the hood.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
2. This emissions unit shall not employ more than 1,200,000 pounds of gelcoat per rolling, 12-month period.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
3. The temperature of the exhaust gases at the inlet to the catalyst bed of the incinerator, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
4. Only acetone and/or dibasic ester consisting of 66% dimethyl glutarate, 17% dimethyl adipate, and 16.5% dimethyl succinate, by weight, shall be used as cleanup materials in this emissions unit.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
5. The monomeric styrene content of the gelcoat utilized in this process shall not exceed 42%, by weight, as employed.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
6. The permittee shall not employ more than 4 gallons of cleanup materials per day in this emissions unit.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 01-7475]
7. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)  
  
[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)]

## II. Operational Restrictions (continued)

8. Applicable operational requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature immediately upstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

2. The permittee shall collect and record the following information for each day:
  - a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
  - c. Number of cycles each hour.
  - d. The name and identification number of each gelcoat, as employed.
  - e. The number of pounds of each gelcoat employed.
  - f. The styrene content of each gelcoat employed, in percent by weight.
  - g. Number of pounds of all gelcoats employed each hour.
  - h. The total number of pounds of cleanup materials (acetone and/or dibasic ester) employed, in pounds per day.
  - i. The organic compound emission rate for all cleanup materials (acetone and/or dibasic ester), in pounds per day.
  - j. The total number of hours the emissions unit was in operation.
  - k. The average hourly organic compound emission rate for all cleanup materials, i.e., (i)/(j), in pounds per hour.
  - l. The number of gallons of cleanup materials employed each day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month:
- The number of pounds of all gelcoats employed.
  - The rolling, 12-month summation of all gelcoats employed, in pounds.
  - The total uncontrolled organic compound emission rate for all gelcoats, in pounds or tons per month.
  - The total uncontrolled (fugitive) organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (c) \* (1 - (capture efficiency/100)).
  - The calculated, controlled organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (c) \* (capture efficiency/100) \* (1 - (control efficiency/100)).
  - The total organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (d) + (e).
  - The total organic compound emission rate for all cleanup materials employed, in pounds or tons per month, i.e., the summation of the daily values from Section A.III.2.f.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

4. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)]

5. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
  - a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - b. Any hour during which more than 480 pounds of gelcoat were employed;
  - c. Any rolling, 12-month period during which more than 1,200,000 pounds of gelcoat were employed;
  - d. Any hour during which this emissions unit was operated for more than 8 cycles;
  - e. An identification of each day during which the average hourly organic compound emissions for all cleanup materials exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day;
  - f. All periods of time during which the monomeric styrene content of the gelcoat employed in this emissions unit exceeded 42%, by weight;
  - g. An identification of each day during which more than 4 gallons of cleanup materials were employed; and
  - h. An identification of each day during which any material other than acetone and/or dibasic ester consisting of 66% dimethyl glutarate, 17% dimethyl adipate, and 16.5% dimethyl succinate, by weight, was used for cleanup of this emission unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

3. The permittee shall submit annual reports which specify the total gelcoat usage, the total organic compound emissions from the use of gelcoat, and the total organic compound emissions from the use of cleanup materials from this emissions unit for the previous year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

4. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR part 63.5780-5935)]

5. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SS (40 CFR part 63.980-999)]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

2. The permittee shall conduct or have conducted, organic compound emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days after the modification to this emissions unit is complete;
  - b. The test(s) shall be conducted while this emissions is venting organic compound emissions to the catalytic incinerator. The emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office. The temperature immediately upstream of the incinerator's catalyst bed shall be continuously monitored and recorded during the emission test(s);
  - c. The following test method(s) shall be employed to determine compliance with the overall control efficiency limitation for organic compound emissions:
    - i. The capture efficiency shall be determined using methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases;
    - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
    - e. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
    - f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-15-04(A) and PTI 01-7475]

3. Emission Limitation: Organic compound emissions (from all gelcoats) shall not exceed 11.7 pounds per hour.

Applicable Compliance Method: This emission limitation represents the maximum restricted hourly emission rate and was derived by summing the uncontrolled (fugitive) and controlled emissions for this emissions unit (8.8 and 2.9 pounds per hour, respectively). The uncontrolled (fugitive) and controlled emissions were based upon the maximum restricted amount of gelcoat applied per hour (480 pounds), an organic compound emission factor developed from emission testing (0.0789 pound per pound of gelcoat applied) and the capture and control efficiencies for the primary enclosure and catalytic incinerator (76.7 and 90 percent, respectively). Compliance shall be based upon the emission testing required above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

## V. Testing Requirements (continued)

4. Emission Limitation: Organic compound emissions (from cleanup materials) shall not exceed 3.0 pounds per hour.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III.2. The organic compound emission rate for the cleanup materials utilized in this process (acetone and/or dibasic ester) shall be based upon a summation of the organic compound emission rates for acetone and dibasic ester as determined in accordance with the following procedure. The usage rate of acetone shall be multiplied by the emission factor of 1.0 pound of acetone emitted per pound of acetone used. The usage rate of dibasic ester shall be multiplied by the emission factor of 0.00717 pound of dibasic ester emitted per pound of dibasic ester used.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

5. Emission Limitation: Organic compound emissions (from all gelcoats) shall not exceed 14.7 tons per year.

Applicable Compliance Method: Compliance shall be based upon a summation of the monthly records specified in Section A.III.3.f.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

6. Emission Limitation: Organic compound emissions (from cleanup materials) shall not exceed 13.1 tons per year.

Applicable Compliance Method: Compliance shall be based upon a summation of the monthly records specified in Section A.III.3.g.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

7. Emission Limitations: Organic HAP emissions shall not exceed 267 pounds per ton of white/off white pigmented gel coating applied and 377 pounds per ton of all other pigmented gel coating applied on a 12-month rolling average.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

8. The monomeric styrene content of the gelcoat utilized in this process shall be determined in accordance with the gelcoat supplier's MSDS sheets. If required, the permittee shall conduct or have the gelcoat supplier conduct an analysis of any gelcoat employed in this emissions unit in accordance with 40 CFR Part 60, Appendix A, Method 24. When Method 24 is used, the weight percent monomer shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a discrepancy between the MSDS data and the analyses performed in accordance with 40 CFR Part 60, Appendix A, Method 24, the Method 24 data will take precedence.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-7475]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #1 (R003)  
**Activity Description:** Resin Application and Vacuum Curing

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #1	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

##### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #2 (R004)  
**Activity Description:** Resin Application and Vacuum Curing

### A. State and Federally Enforceable Section

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #2	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

#### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

#### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #3 (R005)  
**Activity Description:** Resin Application and Vacuum Curing

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #3	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

##### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #4 (R006)  
**Activity Description:** Resin Application and Vacuum Curing

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #4	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

##### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #5 (R007)  
**Activity Description:** Resin Application and Vacuum Curing

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #5	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

##### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Lamination Table #6 (R008)  
**Activity Description:** Resin Application and Vacuum Curing

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
panel lamination operation - resin application and vacuum curing - Lamination Table #6	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use. See A.2.a below.
	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See A.2.b below.
	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The applicable hourly and daily OC emissions limitations from OAC 3745-21-07(G)(1) for this emissions unit are greater than the potential to emit. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The following emissions limitation applies to all open molding operations at the facility that incorporate the manual application of non corrosion resistant/non high performance resins:
  - i. Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.
- 2.c Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

##### II. Operational Restrictions

1. The monomeric styrene content of the resin employed by this emissions unit shall not exceed the monomeric styrene content employed during the most recent emission tests that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the purpose of demonstrating compliance with the 8 pound per hour and 40 pound per day OC emission limitations:
  - a. The name and identification number of each resin and photochemically reactive cleanup material employed;
  - b. The OC content of each photochemically reactive cleanup material employed;
  - c. The number of pounds of resin employed each hour;
  - d. The number of pounds of photochemically reactive cleanup material employed each hour;
  - e. The total number of pounds of resin employed each day;
  - f. The total number of pounds of photochemically reactive cleanup material employed each day;
  - g. The hourly OC emission rate for the resin, in pounds, i.e., (c) multiplied by the emission factor developed from the most recent gravimetric test demonstrating compliance. The emission factor developed from the most recent gravimetric test conducted on January 25, 2007 was .0069 pound of OC per pound of resin applied;
  - h. The hourly OC emission rate for any photochemically reactive cleanup material, in pounds, i.e., (b) multiplied by (d);
  - i. The total hourly OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, (g) plus (h);
  - j. The daily OC emission rate for the resin, in pounds, i.e., the sum of (g) for each hour during the day that the emissions unit was operated;
  - k. The daily OC emission rate for the photochemically reactive cleanup material, in pounds, i.e., the sum of (h) for each hour during the day that the emissions unit was operated; and
  - l. The total daily OC emission rate for all resins and photochemically reactive cleanup materials, in pounds, i.e, the sum of (g) plus (h) for each hour during the day that the emissions unit was operated.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rules 3745-21-07(G)(2), 3745-21-07(G)(4) and 3745-77-07(C)(1)]

2. Applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the hourly organic compound emission rate from the panel lamination process exceeded 8 pounds per hour, and the actual hourly organic compound emission rate for each such hour; and
  - b. an identification of each day during which the organic compound emission rate from the panel lamination process exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rules 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)]

3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-21-07(G) and 3745-77-07(C)(1)]

4. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day when the oven is not in use.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in Section A.III.1 and periodic gravimetric testing.

- b. Emission Limitations: Organic compound emissions shall not exceed 3 pounds per hour and 15 pounds per day when the oven is in use.

Applicable Compliance Method: Compliance shall be based on the following:

- i. The results of the most recent compliance test shall be used to demonstrate compliance with the 3 pounds per hour OC emissions limitation. The facility demonstrated compliance with the 3 pounds per hour OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour);

- ii. The results of the most recent compliance test shall be used to demonstrate compliance with the 15 pounds per day OC emissions limitation. The facility demonstrated compliance with the 15 pounds per day OC emissions limitation during the most recent compliance test conducted on June 28, 2007 (0.09 pounds OC per hour = 2.16 pounds per day); and

- iii. The emissions tests conducted on June 28, 2007 measured emissions from the ovens associated with the lamination tables (R003-R008). The results of this test and required future testing can be used to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations but can not be used to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emissions limitations.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

2. The permittee shall conduct, or have conducted, gravimetric testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration;

- b. Provided the manufacturing process remains identical for all 6 lamination tables (R003-R008), the permittee may conduct or have conducted, gravimetric testing on only one lamination table;

- c. The gravimetric testing shall be conducted to demonstrate compliance with the 8 pounds per hour and 40 pounds per day OC emission limitations; and

- d. The gravimetric testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on December 22, 2006.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(2) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration;
  - b. The emission testing shall be conducted to demonstrate compliance with the 3 pounds per hour and 15 pounds per day OC emission limitations;
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
  - d. The test(s) shall be conducted while emissions units R003, R004, R005, R006, R007 and R008 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;
  - e. The emissions testing shall be consistent with the procedures and methods specified in the Intent to Test submitted to Ohio EPA, Central District Office on June 6, 2007;
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);
  - g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rules 3745-15-04(A), 3745-21-07(G)(1) and 3745-77-07(C)(1)]

4. Emission Limitations: Organic HAP emissions shall not exceed 87 pounds per ton of resin applied.

Applicable Compliance Method: Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935) ]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

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**THIS IS THE LAST PAGE OF THE PERMIT**

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# Statement of Basis For Title V Permit

Part I - General	
Company Name	Fiber-Tech Industries, Inc. (FKA Crane Core Tec)
Premise Number	0124010112
What makes this facility a Title V facility?	OC
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
II.A.1	25-03		Facility is subject to the emission control action rograms.
II.A.2		WWWW MACT	Facility is subject to MACT emission limitations, monitoring and record keeping, reporting and testing requirements.
II.A.3		SS NESHAP	Facility is subject to NESHAP for the purpose of demonstrating compliance with the WWWWW MACT using add-on controls.

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P002, and P003	0.05 grain/dscf PE	31-05(A)(3)	N	n	n	n	n	n	n	n	n	n	y	n	Compliance shall be demonstrated through Method 1-5 stack tests.
P002, P003 and P004	20% VE	17-07(A)	N	n	n	n	n	n	y	n	y	n	n	n	If necessary, compliance shall be determined through visible emissions observations performed in accordance with Method 9.
P002, P003 and P004	15.7 lbs PE/hr	17-11(B)(3)	N	n	n	n	n	n	n	n	n	n	y	n	Compliance shall be demonstrated through Method 1-5 stack testing.

P009	8 lbs OC/hr, 40 lbs OC/day	21- 07(G)(2)	N	n	n	n	n	n	y	n	y	n	y	n	Compliance shall be demonstrated through periodic gravimetric testing.
R001	8 lbs OC/hr and 40s lbsOC/day	21- 07(G)(2)	N	y	n	n	n	n	n	n	n	n	n	n	Not applicable under 3745-21-07(G)(9)(G).
R001	11.7 lbs OC/hr and 14.7 tpy OC (from gelcoat)	31- 05(A)(3)	N	n	y	n	n	n	y	n	y	n	y	n	Compliance shall be demonstrated through applicable testing methods of 3745-21-10(C).
R001	3.0 lbs OC/hr and 13.1 tpy OC (from clean- up)	31- 05(A)(3)	N	n	y	n	n	n	y	n	y	n	n	n	Compliance shall be demonstrated through record keeping requirements specified in section A.III.2.
R001	Use of Catalytic Incinerator with minimum control efficiency of 90%.	31- 05(A)(3)	N	n	y	n	n	n	n	n	n	n	n	n	Compliance shall be demonstrated through applicable testing methods of 3745-21-10(C).
	Overall reduction of OC emissions by a minimum of 69%.		N	n	y	n	n	n	n	n	n	n	n	n	Compliance shall be demonstrated through applicable testing methods of 3745-21-10(C).
	Continuous use of secondary enclosure.		N	n	n	n	n	n	n	n	n	n	n	n	NA

R001	267 lbs HAP/ton white pigment gel coating.	N	Y	n	y	y	n	n	y	n	y	n	y	n	MACT Subpart WWWW - Compliance shall be demonstrated according to the applicable requirements of the MACT Subpart and General Provisions.
	377 lbs HAP/ton other pigmented gel coating.	N	Y	n	y	y	n	n	y	n	y	n	y	n	MACT Subpart WWWW - Compliance shall be demonstrated according to the applicable requirements of the MACT Subpart and General Provisions.
R001	NA	N	Y	n	n	y	n	n	y	n	y	n	n	n	MACT Subpart SS - Compliance shall be demonstrated according to the applicable requirements of the MACT Subpart and General Provisions.
R003, R004, R005, R006, R007 and R008	8 lbs OC/hr and 40 lbsOC/day (w/o oven)	21-07(G)(2)	N	n	y	n	n	n	y	n	y	n	y	n	Compliance shall be demonstrated through periodic gravimetric testing and record keeping requirements.
	3 lbs OC/hr and 15 lbsOC/day (w/ Oven)	21-07(G)(1)	N	n	y	n	n	n	y	n	y	n	y	n	Compliance shall be demonstrated through emissions testing and record keeping requirements.
R003, R004, R005, R006, R007 and R008	87 lbs HAP/ton resin applied	N	Y	n	y	y	n	n	y	n	y	n	y	n	MACT Subpart WWWW - Compliance shall be demonstrated according to the applicable requirements of the MACT Subpart and General Provisions.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**C Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**C Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.