



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

11/28/07

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

02-04-01-0442
Iten Industries Inc. (Plant 3)
Roy Baumer
PO Box 2150
Ashtabula, OH 44004

Dear Roy Baumer:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 10/01/07. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43215**

and

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,


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

cc: Northeast District Office
File, DAPC PIER



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 11/28/07

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: 02-04-01-0442 to: Iten Industries Inc. (Plant 3) 1303 West 38th Street Ashtabula, OH 44004

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description. Rows include P001-P011 with descriptions of pultrusion machines and vertical saws.

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:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

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. MACT REQUIREMENTS

The following emissions units located at this facility are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:

P001 - pultrusion machine #1;
P002 - pultrusion machine #2;
P003 - pultrusion machine #3;
P004 - pultrusion machine #4;
P005 - pultrusion machine #5;
P006 - pultrusion machine #6;
P007 - pultrusion machine #7; and
P009 - Cowels Mixer #1.

[Authority for term: 40 CFR 63.5800, Table 2 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-31-05 (A)(3)]

2. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart WWWW

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:

Parts 63.1(a)(1)-(4), 63.1(a)(6), 63.1(a)(10)-(14), 63.1(b)(1), 63.1(b)(3), 63.1(c)(1) and (2), 63.1(c)(5), 63.1(e), 63.2, 63.3, 63.4, 63.5(a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5(b)(6), 63.5(d)(1) and (2), 63.5(d)(4), 63.5(e)(1) - (5), 63.5(f)(1) and (2), 63.6(a)(1) and (2), 63.6(b)(1)-(5), 63.6(b)(7), 63.6(c)(1) and (2), 63.6(c)(5), 63.6(e)(1) - (3), 63.6(f)(2) and (3), 63.6(g)(1) - (3), 63.6(i)(1)-(14), 63.6(i)(16), 63.6(j), 63.7(a)(1), 63.7(a)(3), 63.7(b)(1) and (2), 63.7(c), 63.7(d), 63.7(e), 63.7(f), 63.7(g), 63.7(h), 63.8(a)(1) and (2), 63.8(a)(4), 63.8(b)(1) - (3), 63.8(c)(1) - (4), 63.8(c)(6) - (8), 63.8(d), 63.8(e)(1) - (4), 63.8(e)(5)(i), 63.8(f)(1) - (6), 63.8(g)(1) - (5), 63.9(a)(1)-(4), 63.9(b)(1) and (2), 63.9(b)(4)(i), 63.9(b)(4)(v), 63.9(b)(5), 63.9(c), 63.9(d), 63.9(e), 63.9(g)(1), 63.9(g)(3), 63.9(h)(1) - (3), 63.9(h)(5) and (6), 63.9(i), 63.9(j), 63.10(a), 63.10(b)(1), 63.10(b)(2)(i) - (xiv), 63.10(b)(3), 63.10(c)(1), 63.10(c)(5) - (8), 63.10(c)(10) - (15), 63.10(d)(1) and (2), 63.10(d)(4) and (5), 63.10(e)(1) - (3), 63.10(f), 63.11, 63.12, 63.13, 63.14, and 63.15.

The following emissions units are subject to the aforementioned requirements: P001, P002, P003, P004, P005, P006, P007 and P009.

3. The permittee shall comply with the work practice standard to not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW]

4. The permittee shall comply with the work practice standard to keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW]

MONITORING AND RECORD KEEPING

A. State and Federally Enforceable Section (continued)

5. The permittee must maintain the following records:
- a. a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv); and
 - b. a certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

[Authority for term: 40 CFR 63.5915(a)(1) and (d)]

6. All applicable records must be maintained in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. Records may be kept in hard copy or computer readable form including, but not limited to: paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[Authority for term: 40 CFR 63.5920(a), (b), (c) and (d)]

7. The permittee must maintain a certified statement that the facility is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

[Authority for term: 40 CFR Part 63.5915(d)]

- a. The permittee shall maintain records which identify each HAP in each cleaning solvent employed. If any cleaning solvent contains styrene, the specific application shall also be documented.
- b. The permittee shall maintain records which document any time containers that store HAP containing materials were not kept closed or covered except during the addition or removal of materials. The records shall indicate how long the containers were not properly closed or covered and any actions taken to prevent a reoccurrence.

[Authority for term: 40 CFR 63.5835, 40 CFR 63.5935 and Table 4 of 40 CFR Part 63, Subpart WWWW]

REPORTS AND NOTIFICATIONS

8. The permittee submitted an Initial Notification containing the information specified in 40 CFR 63.9(b)(4) and (5) on May 1, 2002, in conformance with 40 CFR 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

[Authority for term: 40 CFR 63.5905(b)]

9. The permittee must submit a compliance report semiannually.

- a. The first compliance report must cover the period beginning on the compliance date that is specified in 40 CFR 63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified in 40 CFR 63.5800.

The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified in 40 CFR 63.5800.

- b. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-31-05(A)(3)]

A. State and Federally Enforceable Section (continued)

- 10.** Each semiannual compliance report must contain the following information:
- a. the company name and address;
 - b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. the date of the report and beginning and ending dates of the reporting period;
 - d. if there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period; and
 - e. for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

[Authority for term: 40 CFR Part 63.5910(c) and (d)(1) and (2)]

- 11.** Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

[Authority for term: 40 CFR Part 63.5910(g)]

- 12.** If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.

[Authority for term: 40 CFR 63.5905 (b)]

- 13.** The permittee must report if the facility has exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make the facility subject to 40 CFR 63.5805(b) or (d). Include with this report any request for an exemption under 40 CFR 63.5805(e). If the facility has receive an exemption under 40 CFR 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, the permittee must report this exceedance as required in 40 CFR 63.5805(f).

[Authority for term: 40 CFR 63.5910(f)]

COMPLIANCE AND TESTING

A. State and Federally Enforceable Section (continued)

14. Initial Compliance Demonstration

a. For the work practice standard that the permittee not use cleaning solvents that contain HAP, the permittee has demonstrated initial compliance if a certified statement is included in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

b. For the work practice standard the permittee keep containers that store HAP-containing materials closed or covered, the permittee has demonstrated initial compliance if a certified statement is included in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

[Authority for term: 40 CFR 63.5860(a) and Table 9 of 40 CFR Part 63, Subpart WWWW]

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pultrusion Unit No. 1 (P001)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P001 - pultrusion machine #1, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$ = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i , as specified in section A.III.1.c, in percent by weight

$EF(OC_i)$ = the emission factor i :

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 2 (P002)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P002 - pultrusion machine #2, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$ = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i , as specified in section A.III.1.c, in percent by weight

$EF(OC_i)$ = the emission factor i :

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 3 (P003)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P003 - pultrusion machine #3, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$ = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i , as specified in section A.III.1.c, in percent by weight

$EF(OC_i)$ = the emission factor i :

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 4 (P004)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P004 - pultrusion machine #4, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$ = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i , as specified in section A.III.1.c, in percent by weight

$EF(OC_i)$ = the emission factor i :

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

$0.40 = (1 - 0.60)$, where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 5 (P005)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P005 - pultrusion machine #5, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b. OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1. Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c. Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule. Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

E(OC) = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i, as specified in section A.III.1.c, in percent by weight

EF(OC_i) = the emission factor i:

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 6 (P006)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P006 - pultrusion machine #6, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$ = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i , as specified in section A.III.1.c, in percent by weight

$EF(OC_i)$ = the emission factor i :

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Pultrusion Unit No. 7 (P007)

Activity Description: Pultrusion machine for molding of geometric FRP profiles

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>
P007 - pultrusion machine #7, equipped with a cut-off saw, and shares a common baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 1650 lbs/month and 9.9 tons/year. See section A.II.1.
		Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.c.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** To meet the emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW of reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830. The requirements for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or no preform injection system, are as follows:
- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
 - ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
 - iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
 - iv. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - v. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vi. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - vii. The enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift and/or
 - (b) 45 minutes per any 12 hour shift.
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day.
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - viii. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.c** Total particulate emissions shall not exceed 0.010 gr/dscf, 0.47 lb/hr, and 2.1 tons/year from emissions units P001 - P007 (Pultrusion Machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each resin employed;
- b. the weight of each resin employed, in pounds;
- c. the OC content of each resin employed, in percent by weight;
- d. the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
- e. the actual number of hours that the emissions unit was in operation;
- f. the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
- g. the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

- a. the company identification for each cleanup material employed;
- b. an identification of whether or not each cleanup material employed is acetone;
- c. the volume of each cleanup material applied, in gallons;
- d. the OC content of each cleanup material applied, in pounds per gallon;
- e. the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
- f. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.3;
- g. if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
- h. the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall inspect the wet area enclosure when there is resin present in the resin bath and record the following information:
- the date and reason why any required inspection was not performed;
 - the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e) and PTI 02-20074]

5. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a description of the corrective action;
- the date corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) of the deviation;
- the pressure drop readings immediately after the corrective action was implemented; and
- the name(s) of the personnel who performed the work.

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

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 1650 pounds per month, and the actual OC emissions for each such month;
 - d. an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
 - e. an identification of each day in which an inspection was not performed on the enclosure when there was resin present in the resin bath;
 - f. an identification of the date and duration of time when the enclosure was not in place over the resin bath and there was resin present in the resin bath; and
 - g. an identification of the date and duration of time that the enclosure's access panels, doors, hatches or covers were open when there was resin present in the bath, such that the open area was greater than 2 times the puller window area, for a any period of time exceeding 30 minutes per any 8-hours shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830), a statement that there were no deviations from the organic HAP emission limitation during the reporting period; and
 - b. for each deviation from the organic HAP emission limitation as specified in section A.I.2.a (reducing the total organic HAP emissions by at least 60 weight percent, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on the pultrusion machine as specified in 40 CFR 63.5830.), the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.1.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.1.b and A.III.1.c. Compliance shall be determined based upon the following equation:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i) \times (0.40)$$

where:

E(OC) = OC emissions as from all resin/resin mix operations, in pounds per day;

W_i = the weight of resin i employed, as specified in section A.III.1.b, in pounds per day;

OC_i = the OC content of resin i, as specified in section A.III.1.c, in percent by weight

EF(OC_i) = the emission factor i:

i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88)); and

ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = (1 - 0.60), where 60 weight percent reduction of OC emissions is accounted for by meeting the requirements in section A.I.2.a for a wet area enclosure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.1, and adding the daily OC emissions from all resins, as recorded each day in section A.III.1.d and calculated per section A.V.1.b, from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 1650 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in section A.III.2. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material i applied, as specified in section A.III.2.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.2.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from cleanup materials for this emissions unit shall be determined at the end of each calendar year, by maintaining the monthly records as required in section A.III.2 and by summing the actual monthly emissions from section A.V.1.d, and then dividing this total by 2000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.f Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.g Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Politen Mix Unit No.1 (P009)

Activity Description: Politen mixing from polyester resin and fillers for pultrusion

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>
P009 - Cowels Mixer #1, with a wall vent with a fabric filter for dust collection	OAC rule 3745-31-05(A)(3) (PTI 02-20074)	Organic compound (OC) emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year. See sections A.I.2.a and A.I.2.b.
		OC emissions from cleanup materials shall not exceed 900 lbs/month and 5.4 tons/year. See section A.II.1.
		Particulate emissions (PE) shall not exceed 0.012 lb/hr and 0.05 ton/year.
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.1 through A.14 and Part III, section A.I.2.a for the applicable requirements of this rule.
		Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart A	See Part II, section A.2 for the applicable requirements of this rule. Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

2. Additional Terms and Conditions

- 2.a** The permittee must meet the appropriate work practice standards below for this emissions unit as required in Table 4 of 40 CFR Part 63, Subpart WWWW:
- i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
 - ii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- 2.b** OC emissions emitted from this emissions unit contain photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The permittee shall use only acetone as cleanup material for this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20074]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the date and all times the fabric filter was not in service to control PE when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

2. The permittee shall collect and record the following information each day for this emissions unit:
- the company identification for each resin employed;
 - the weight of each resin employed, in pounds;
 - the OC content of each resin employed, in percent by weight;
 - the total OC emission rate for all resin employed, calculated as required in section A.V.1.b, in pounds per day;
 - the actual number of hours that the emissions unit was in operation;
 - the average, hourly OC emission rate for all resins employed, calculated by (d)/(e), in average, pounds per hour; and
 - the daily and hourly (average) OC emissions rates are to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

3. The permittee shall collect and record the following information each month for this emissions unit:
- the company identification for each cleanup material employed;
 - an identification of whether or not each cleanup material employed is acetone;
 - the volume of each cleanup material applied, in gallons;
 - the OC content of each cleanup material applied, in pounds per gallon;
 - the total OC emission rate for all cleanup material materials, in pounds per month, calculated as required in section A.V.1.d;
 - if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in section A.III.4;
 - if a credit for recovered cleanup material is used, the volume of this material added to the recovery container, in gallons per month; and the adjusted volume of cleanup materials employed, calculated by subtracting the volume of the recovered cleanup material added to the recovery container, from the volume of the total cleanup material applied (c), in gallons per month (adjusted); and
 - the monthly OC emission rate is to be calculated by no later than the first week of the following month from which information was collected for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup materials, and the recovery container serving this emissions unit:
- the date the materials from the recovery container were shipped off site; and
 - the number of gallons or pounds of materials from the recovery container shipped off site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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

5. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standards identified in section A.I.2.a and shall contain the following information:
- whether the emissions unit was in operation;
 - whether the mixer cover was employed each time a mixer was in operation, except when adding materials or changing covers to the mixing vessels; and
 - whether there was a visible gap present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - an identification of each day during which the OC emissions, excluding cleanup materials, from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - an identification of each month during which the OC emissions, from cleanup materials, from this emissions unit exceeded 900 pounds per month, and the actual OC emissions for each such month;
 - an identification of each month during which any cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month; and
 - an identification of each day during which an inspection was not performed by the required frequency in section A.III.5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

2. The permittee must submit semiannual compliance reports:
- if there are no deviations from the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a, a statement that there were no deviations from the organic HAP emissions limitation during the reporting period; and
 - for each deviation from the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, as specified in section A.I.2.a, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: 40 CFR 63.5910(b)(1), (2), and (3), Table 14 of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-77-07(C)(1) and PTI 02-20074]

IV. Reporting Requirements (continued)

3. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements

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

- 1.a Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the daily OC emissions, as calculated in section A.V.1.b, by the actual number of hours that the emissions unit was in operation, as recorded in section A.III.2.e.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

- 1.b Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in sections A.III.2.b and A.III.2.c. Compliance shall be determined based upon the following equation:

$$EM(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC)$$

where:

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

W_i = the weight of resin mix i produced, as specified in section A.III.2.b, in pounds per day;

OC_i = the OC content of mix i, as specified in section A.III.2.c, in percent by weight; and

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions, excluding emissions from cleanup materials, shall not exceed 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.2, and adding the daily OC emissions from all resins, as recorded each day in section A.III.2.d and calculated per section A.V.1.b, from this resin mixing unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.d Emission Limitation:

OC emissions from cleanup materials shall not exceed 900 lbs/month.

Applicable Compliance Method:

Compliance shall be based on maintaining the daily records as required in section A.III.3. Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i)$$

where:

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

V_i = the volume of cleanup material applied, as specified in section A.III.3.c, in gallons per month; and

OC_i = the OC content of cleanup material i , as specified in section A.III.3.d, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.e Emission Limitation:

OC emissions from cleanup materials shall not exceed 5.4 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on maintaining the daily records as required in section A.III.3, and by summing the monthly OC emissions from all cleanup materials, as recorded each month in section A.III.3.e, from this resin mixing unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

V. Testing Requirements (continued)

1.f Emission Limitation:

PE shall not exceed 0.012 lb/hr.

Applicable Compliance Method:

Compliance shall be based upon the following equation:

$$E(PE) = P \times \text{CONCsolid} \times EF(PE) \times (1-CE)$$

where:

P = maximum mix production rate, which is 1000 lbs/hr as noted in the permit application;

CONCsolid = maximum solids concentration in the mix, which is 575.3 lbs fillers/1000 lb batch as noted in the permit application;

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

CE = efficiency of PE control device is 99.9%, or 0.999, as specified in the permit application.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.g Emission Limitation:

PE shall not exceed 0.05 ton/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.012 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

1.h Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20074]

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: Vertical Saw (P011)

Activity Description: Vertical saw (dog bone) for cutting geometric links of FRP generating PM

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>
P011 - Dog bone saw, with baghouse.	OAC rule 3745-31-05(A)(3) (PTI 02-22338)	Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year. See section A.I.2.a. Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Total PE shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year from emissions units P001 - P007 (Pultrusion machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

1.b Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

1.c Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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 rule 3745-77-07(C)(1) and PTI 02-22338]

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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