



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

08/14/03

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

13-18-54-4510
Glastic Corporation Cleveland Facility
Terry L Weddle
4321 Glenridge Road
Cleveland, OH 44121-2891

Dear Terry L Weddle:

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

**Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215**

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

If you have any questions concerning this draft Title V permit, please contact Cleveland Division of Air Pollution Control.

Sincerely,


Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronically submitted)
File, DAPC PMU
Cleveland Division of Air Pollution Control
Pennsylvania



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 08/14/03

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: 13-18-54-4510 to:
Glastic Corporation Cleveland Facility
4321 Glenridge Road
Cleveland, OH 44121-2891

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units P001 through P061 with detailed descriptions of their activities and equipment.

components for production of Bulk Molding Compound.

P062 (L600 Mixer)
Littleford Mixer. 600 liter mixer used for making

Bulk Molding Compound.

P063 (Tote Filling - Cold Room)
Resin totes are filled in this process via closed hose

and resin filter systems. Totes are covered and vapors are filtered to filter house as tote is filled.

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. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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, 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. 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))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

- (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii)

pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

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

- 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))

2. 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 unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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.

(Authority for term: OAC rule 3745-77-07(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 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(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

Each insignificant activity 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))

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

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 deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.
2. Within 120 days after promulgation of 40 CFR 63 Subpart WWWW, Reinforced Plastic Composite Production, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - 2.a the name and mailing address of the permittee;
 - 2.b the physical location of the source if it is different from the mailing address;
 - 2.c identification of the relevant MACT standard and the permittee's compliance date;
 - 2.d a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - 2.e a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
3. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63 Subpart WWWW, Reinforced Plastic Composite Production, the permittee shall submit a notification of compliance status that contains the following information:
 - 3.a the methods used to determine compliance;
 - 3.b the results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - 3.c the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - 3.d the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Subpart WWWW, Reinforced Plastic Composite Production;
 - 3.e an analysis demonstrating whether the affected source is a major source or an area source;
 - 3.f a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - 3.g a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart WWWW, Reinforced Plastic Composite Production.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - Gas-fired Boiler.
B002 - Gas-fired Boiler.
T001 - Tank #1.
T002 - Tank #2.
T003 - Tank #3.
T004 - Tank #4.
T005 - Tank #5.
T006 - Tank #6.
T007 - Tank A.
T008 - Tank B.
T009 - Tank C.
P002 - R&D Lab Oven #1.
P003 - R&D Lab Oven #2.
P004 - R&D Lab Oven #3.
P005 - R&D Lab Oven #4.
P006 - R&D muffler oven.
P007 - R&D curing oven.
P011 - Sander #1.
P013 - Post cure Oven.
P016 - Fiber rod line #1, 2, 3 & Splicer.
P019 - Parts Finishing Sander.
P021 - R&D BMC Mixer.
P022 - Sander #2.
P024 - Fiber Rod Line #4.
P041 - CT Press 2.
P043 - CT Press 5.
P044 - CT Press 7.
P045 - CT Press 8.
P046 - CT Press 9.
P048 - CT Press 11.
P055 - CT Press 23.
P057 - CT Press 28.
P058 - CT Press 29.
Z003 - Tote Storage, cold room.
Z004 - Lab Press.
Z005 - Pultrusion Mixer & Tote Staging.
Z006 - Pultrusion cut-off dust collectore #6
Z007 - Pultrusion cut-off dust collectore #7
Z008 - Pultrusion cut-off dust collectore #8
Z009 - CT Press 20.
Z010 - R&D Pultrusion Line #1.
Z011 - R&D Pultrusion Line #2.

Each insignificant emissions unit at this facility must comply with all State and federal regulations, as well as any emission limitation and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tote Wash - Cold Room (L001)

Activity Description: A Glastic engineered device that uses a monomer based cleaning mixture and spray wand on an automated cycle to clean resin totes.

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>
Tote washer that uses a monomer mixture to clean resin totes.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	40 lbs of volatile organic compound (VOC) emissions per day 7.3 tons per year (TPY) of VOC emissions. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-09(O)(2) 40 CFR Part 63, subpart WWWW, Reinforced Plastic Composite Production	See Section A.I.2.a below. See A.I.2.b and A.I.2.e below. See A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.
- 2.b** The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during drainage, unless an internal type drainage device cannot fit into the cleaning system.
- 2.c** The permittee must meet the requirements of paragraphs (a) through (h) of 63.5805 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.
- 2.d** The permittee must meet the requirements of paragraphs (a) through (d) of 63.5835 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.
- 2.e** The tote washer is not a conventional cold cleaning equipment, therefore, some requirements in the OAC rule 3745-21-09(O)(2) are not applicable to this emissions unit.

II. Operational Restrictions

1. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers; and
 - c. clean only materials that are neither porous nor absorbent.
2. The permittee shall use one or more work practice standards in 40 CFR Part 63 Subpart WWWW Section 63.5835.

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 types of solvents employed in the cold cleaner;
 - b. the vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - c. a log of the actual number of washes performed per day; and
 - d. the VOC emission rate, in pounds per day, determined in accordance with Section A.V.1.a. below.
2. The permittee must keep records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5915 (a) through (e) whichever portions are applicable.
3. The permittee must maintain records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5920 (a) through (d) whichever portions are applicable.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual VOC emissions from this emissions unit exceeded the pounds per day limit, and the actual VOC emissions for each such day.
2. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee must submit reports required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5910 (a) through (h) whichever portions are applicable.

These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months.

V. Testing Requirements

1. Compliance with the emissions limitations specified in Section A.I.1 of shall be determined in accordance with the following methodology(s) specified below. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corporation.

V. Testing Requirements (continued)

- 1.a** Emission Limitations: 40.0 lbs/day of VOC emissions; 7.30 tons/yr of VOC emissions

Applicable Compliance Method: To determine the actual daily VOC emissions rate for the cold cleaner, the following equation, based upon emission factors developed by the permittee and submitted 12/06/2000, shall be used:

$$E = (0.94 \text{ lbs OC/wash}) \times (\text{number of washes/day})$$

where:

E = VOC emissions rate (lbs/day); and

the number of washes /day shall be determined by the record keeping as specified in Section A.III.1.c.

To determine the actual yearly VOC emissions rate for the cold cleaner, the daily emissions rate shall be summed for the calendar year.

- 1.b** The permittee shall also comply with the requirements of 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, Sections 63.5805 (a) through (h), and 63.5835 (a) through (d), whichever portions are applicable through the monitoring, record keeping, and reporting requirements of this permit and meeting the requirements of 40 CFR Parts 63.5895 and 63.5900.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2561 issued 09/09/1993.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Parts washer - Cold Room (L002)

Activity Description: Parts washer that utilizes styrene/MMA mixture to wash tubes, parts and filters in an enclosed 30 cubic foot wash chamber.

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>
Fully enclosed automated parts washer that utilizes a monomer mixture to wash tubes, parts and filters.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(2) and 40 CFR Part 63, Subpart WWWW.
		48.0 lbs/day and 8.76 tons/yr of volatile organic compound (VOC) emissions.
	OAC rule 3745-21-09(O)(2)	See A.I.2.a below.
	40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production	See A.I.2.b and A.I.2.e below. See A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.
- 2.b** The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during drainage, unless an internal type drainage device cannot fit into the cleaning system.
- 2.c** The permittee must meet the requirements of paragraphs (a) through (h) of 63.5805 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.
- 2.d** The permittee must meet the requirements of paragraphs (a) through (d) of 63.5835 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.
- 2.e** The parts washer is not built as conventional cold cleaning equipment, therefore, some requirements in the OAC rule 3745-21-09(O)(2) are not applicable to this emissions unit.

II. Operational Restrictions

1. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers;
 - c. close the cover whenever parts are not being handled in the cleaner;
 - d. drain the cleaned parts until dripping ceases; and
 - e. clean only materials that are neither porous nor absorbent.
2. The permittee shall use one or more work practice standards in 40 CFR Part 63 Subpart WWWW Section 63.5835.

III. Monitoring and/or Record Keeping Requirements

- 1.a The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the types of solvents employed in the cold cleaner;
 - b. the vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit;
 - c. a log of the actual number of washes performed per day; and
 - d. the VOC emission rate, in pounds, determined in accordance with Section A.V.1.a. below.
2. The permittee must keep records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5915 (a) through (e) whichever portions are applicable.
3. The permittee must maintain records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5920 (a) through (d) whichever portions are applicable.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual VOC emissions from this emissions unit exceeded the pounds per day limit, and the actual VOC emissions for each such day.
2. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee must submit reports required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5910 (a) through (h) whichever portions are applicable.

These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months.

V. Testing Requirements

1. Compliance with the emissions limitations specified in Section A.I.1 of shall be determined in accordance with the following methodology(s) specified below. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corporation.

V. Testing Requirements (continued)

- 1.a** Emission Limitations: 48.0 lbs/day of VOC emissions; 8.76 tons/yr of VOC emissions.

Applicable Compliance Method: To determine the actual daily VOC emissions rate for the cold cleaner, the following equation, based upon emission factors developed by the permittee and submitted 12/06/2000, shall be used:

$$E = (1.10 \text{ lb VOC/wash}) \times (\text{number of washes/day})$$

where:

E = VOC emissions rate (lbs/day); and

the number of washes /day shall be determined by the record keeping as specified in Section A.III.1.c.

To determine the actual yearly VOC emissions rate for the cold cleaner, the daily emissions rate shall be summed for the calendar year.

- 1.b** The permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, Sections 63.5805 (a) through (h), and 63.5835 (a) through (d), whichever portions are applicable through the monitoring, record keeping, and reporting requirements of this permit and meeting the requirements of 40 CFR Parts 63.5895 and 63.5900.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2561 issued 09/09/1993.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Morehouse Mixer (P014)

Activity Description: The Morehouse Mixer contains two mix kettles with 78 cubic feet of volume that provide resin mixes for use in laminates.

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>
Morehouse mixer contains two mix kettles with 78 cubic feet of volume that provide resin mixes for use in laminates equipped with 700 ACFM fabric filter baghouse	OAC rule 3745-31-05(A)(3)	37.92 lbs/day and 6.92 tons/yr of organic compound (OC) emissions (including OC emissions from the use of cleanup materials). There shall be no visible particulate emissions (PE) from the baghouse stack serving this emissions unit. 0.071 lb/hr of PE and 0.01 grain per dry standard cubic foot of exhaust. 0.31 ton/yr of PE. See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-11(B)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
	40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See Sections A.I.2.c and A.I.2.d below. The OC emission limitation specified by this rule is less stringent than the OC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07(A)(1)

The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.
- 2.b** The OC emissions from the mix operations consist of styrene and methyl methacrylate which are photochemically reactive materials. Therefore, all of the OC emissions from this emissions unit count toward the hourly and daily limits, including the emissions from non-photochemically reactive materials used in the mix operations.
- 2.c** The permittee must meet the requirements of paragraphs (a) through (h) of 63.5805 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.
- 2.d** The permittee must meet the requirements of paragraphs (a) through (d) of 63.5835 of 40 CFR Part 63 Subpart WWWW, Reinforced Plastic Composite Production, whichever portions are applicable.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse particulate control system whenever the emissions unit is in operation.
- 2. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 7.5 inches of water while the emissions unit is in operation.
- 3. The permittee shall use a closed feed system to charge non-liquid material and shall use covers over the mixing kettles.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification for each mold compound and mix manufactured, and each cleanup material employed;
 - b. the number of pounds of each mold compound and mix manufactured;
 - c. the volume of each cleanup material dispensed, in gallons per day;
 - d. the volume of each cleanup material returned, in gallons per day;
 - e. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - f. the OC content of each cleanup material, in pounds per gallon;
 - g. the total number of batches of mold compounds and mixes produced per day; and
 - h. the daily OC emission rate for all resin batches and cleanup, in pounds per day as determined in Section A.V.1.a.

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

2. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 a daily basis.
3. The permittee shall record, for each day, all periods of time during which the baghouse was not in operation when the emissions unit was in operation.
4. The permittee must keep records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5915 (a) through (e) whichever portions are applicable.
5. The permittee must maintain records required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5920 (a) through (d) whichever portions are applicable.

IV. Reporting Requirements

1. The permittee shall notify the Cleveland DAQ in writing of any daily record showing that the closed feed system and mixer covers were 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 Cleveland DAQ within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (DAQ) that specify all exceedances of the following:
 - a. an identification of each day during which the actual OC emissions from this emissions unit exceeded the allowable pounds/day OC emission limitation, and identify what the actual OC emissions for each such day; and
 - b. an identification of all periods of time during which the pressure drop across the baghouse did not comply with the allowable operating range.
3. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.
4. The permittee must submit reports required by 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, 63.5910 (a) through (h) whichever portions are applicable.

These reports shall be submitted to the Cleveland DAQ every six months [i.e., by January 31 and July 31 of each year, and cover the information for the previous six calendar months].

V. Testing Requirements

1. Compliance with the emissions limitations specified in Section A.I.1 of shall be determined in accordance with the following methodology(s) specified below. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corporation.

V. Testing Requirements (continued)

- 1.a** Emission Limitations: 37.92 lbs/day of OC emissions (including OC emissions from the use of cleanup materials); 6.92 tons/yr of OC emissions (including OC emissions from the use of cleanup materials)

Applicable Compliance Method: Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000:

- i. Determination of OC emissions for all mold compounds and mixes:

$$E (\text{mix}) = \text{Summation } (E1 + E2) = \text{Emission rate, lbs OC/day}$$

Where:

$$E1 = \text{head space losses} = \text{Emission rate, lbs OC/day}$$

$$\text{Actual OC concentration, lbs/cu. ft.} = 0.09318 \times (\text{Gaseous vapor pressure}) \times (\text{Vapor molecular weight}) / (\text{Temperature of batch, R})$$

$$E1 = (\text{number of batches/day}) \times (\text{mixer volume, 78 cu. ft./batch}) \times (\text{actual OC concentration, lbs/cu. ft.}) \times (2 \text{ volume changes})$$

$$E2 = \text{film losses} = \text{Emission rate, lbs OC/day}$$

$$E2 = (\text{number of batches/day}) \times (\text{internal mixer area, 84 sq. ft./batch}) \times (\text{film thickness, 0.00167 ft}) \times (\% \text{ monomer, 20})$$

the vapor pressure of styrene is 10 mm Hg, of methyl methacrylate is 60 mm Hg, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 2 mm Hg at 90 degrees Fahrenheit;

the molecular weight of styrene is 104, of methyl methacrylate is 100, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 118;

R is temperature of a batch in degrees Rankin;

Number of batches/day are determined by the record keeping in Section A.III.1;

OC concentration is the sum of the individual monomer concentrations as determined above; and

V. Testing Requirements (continued)

- ii. Determination of OC emissions for all cleanup materials:

Summation [i to z]: $(V_i \times OC_i) = E \text{ (cleanup)} = \text{Emission rate, lbs OC/day}$

Where:

i = Index, 1, 2, 3, ...;

z = number of cleanup materials;

V_i = the volume of evaporated cleanup materials, as specified in Section A.III.1, in gallons per day; and

OC_i = the OC content of cleanup material, as specified in Section A.III.1, in pounds per gallon.

- iii. Determination of OC emissions for all mold compounds, mixes and cleanup materials:

$E \text{ (Total)} = E \text{ (mix)} + E \text{ (cleanup)}$

where:

$E \text{ (Total)}$ = Emission rate, lbs OC/day

If required, the permittee shall determine compliance with this emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, 25, 25A or 25B and the procedures specified in OAC rule 3745-21-10.

Compliance with the annual OC emission limitation shall be determined by summing daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

2. Emission Limitation: There shall be no visible PE from the baghouse stack serving this emissions unit.

Applicable Compliance Method: If required, compliance shall be determined through visible PE observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emission Limitation: 0.071 lb/hr of PE and 0.01 grain/dry standard cubic foot of exhaust.

Applicable Compliance Method: To determine the actual hourly PE rate for this emissions unit, the following equation shall be used:

$E = (\text{exhaust gas flow rate, DSCFM}) \times (0.01 \text{ gr/DSCF}) \times (60 \text{ min/hr}) / (7000 \text{ gr/lb})$

Where:

E = PE rate, lbs/hr;

baghouse exhaust grain loading = 0.01 gr/DSCF;

this equation is based on BAT determination of the baghouse; and

If required, the permittee shall determine compliance with this emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

4. Emission Limitation: 0.31 ton/yr of PE.

Applicable Compliance Method: The annual PE limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

5. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composite Production, Sections 63.5805 (a) through (h), and 63.5835 (a) through (d), whichever portions are applicable through the monitoring, recordkeeping, and reporting requirements of this permit and meeting the requirements of 40 CFR Sections 63.5895 and 63.5900.

VI. Miscellaneous Requirements

1. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
 - b. If necessary, install a stack or stacks as per air dispersion modeling.
 - c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.
2. N/A. Source is in compliance
 3. N/A. Source is in compliance
 4. N/A. Source is in compliance

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>
---	---	--

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 Line 44 (P023)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #44.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	<p>38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC.</p> <p>Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average.</p> <p>2.16 lbs per day and 0.39 tpy of PE.</p> <p>See A.I.2.a below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-07(A)(1)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-11	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2752 issued 11/17/1993.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 1 (P026)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #1.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	15.12 lbs of volatile organic compound (VOC) emissions per day and 2.76 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 1.65 lbs per day and 0.30 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 15.12 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 2.76 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
1.65 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.30 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 3 (P027)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #3.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	3.6 lbs of volatile organic compound (VOC) emissions per day and 0.66 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 1.65 lbs per day and 0.30 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
3.6 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
E6	Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

Ep = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: E(Total) = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
0.66 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
1.65 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.30 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 28 (P028)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #28.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
E6	Toluene Part Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 7 (P029)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce "dogbones" and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #7.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	3.6 lbs of volatile organic compound (VOC) emissions per day and 0.66 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 1.65 lbs per day and 0.30 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 3.6 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
E6	Toluene Part Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

Ep = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: E(Total) = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 0.66 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
1.65 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.30 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 8 (P030)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce "dogbones" and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #8.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	15.12 lbs of volatile organic compound (VOC) emissions per day and 2.76 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 1.65 lbs per day and 0.30 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 15.12 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 2.76 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
1.65 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.30 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 12 (P032)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce "dogbones" and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #12.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	3.6 lbs of volatile organic compound (VOC) emissions per day and 0.66 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 1.65 lbs per day and 0.30 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 3.6 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 0.66 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
1.65 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.30 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 29 (P033)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #29.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 30 (P034)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #30.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
- 2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

- 1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 31 (P035)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #31.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a.** the company identification of each resin batch received for processing, and each cleanup material employed;
 - b.** the volume of each cleanup material dispensed, in gallons per day;
 - c.** the volume of each cleanup material returned, in gallons per day;
 - d.** the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e.** the organic compound content of each cleanup material, in pounds per gallon.
 - f.** the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g.** the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
- 2.** The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

- 1.** Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 32 (P036)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #32.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 40 (P037)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #40.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 41 (P038)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #41.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 42 (P039)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #42.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	—*	—	—

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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 Line 43 (P040)

Activity Description: Pultrusion line where glass rovings and mat are pulled through a wet out bath and a heated die to form and cure a continuous part of constant cross section. The line can produce fuse tubes, channels, doors and rods.

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>
Pultrusion press with a resin bath section, heated die and curing section, and a cut-off saw. Company ID is Pultrusion Line #43.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	38.64 lbs of volatile organic compound (VOC) emissions per day and 7.05 tons per year of VOC. Visible particulate emissions (PE) from this emissions unit shall not exceed 5% opacity, as a six-minute average. 2.16 lbs per day and 0.39 tpy of PE. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11 and 40 CFR Part 63, Subpart WWWW. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

40 CFR Part 63, Subpart WWWW

The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

2. Additional Terms and Conditions

- 2.a** There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing, and each cleanup material employed;
 - b. the volume of each cleanup material dispensed, in gallons per day;
 - c. the volume of each cleanup material returned, in gallons per day;
 - d. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - e. the organic compound content of each cleanup material, in pounds per gallon.
 - f. the total number of hours that the emissions unit was in operation, and the hours of production for each type of resin mix; and
 - g. the daily organic compound emission rate for all resin batches received for processing, in pounds OC per day as determined in Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations of 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:
 38.64 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

i. Determination of OC emission rates for all pultrusion production:

Item No.	Type of Part Produced	Emission Factor lbs OC/sq. ft. of wet area lbs/day	Wet Area sq. ft.	Emission Rate, OC
E1	Fuse Tube	0.120	12	1.44
E2	Channel	0.100	14	1.4
E3	Door	0.070	23	1.61
E4	Rod	0.030	11	0.33
E5	High Vinyl	0.030	23	0.69
Toluene Part				
E6	Generic Pultrusion Part	___*	___	___

* emission factor of any new products to be determined later.

E_p = The summation of the hourly OC emission rates of each pultrusion product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

ii. Determination of daily OC emissions for all cleanup materials:

E_c = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

iii. Determination of total daily OC emissions for this emissions unit resulting from pultrusion production and and cleanup materials used:

$$E(\text{Total}) = E_p + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

1.b Emission Limitation:
 7.05 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

1.c Emission Limitation:
 Visible PE from this emissions unit shall not exceed 5% opacity, as a six- minute average

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
2.16 lbs/day PE.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined by OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:
0.39 ton/yr PE.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2382 issued 04/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 4 (P042)

Activity Description: 4' x 5' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #4.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	12.44 lbs of organic compound (OC) emissions per day and 2.23 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
12.44 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #4 specific emission factor developed by the permittee:
0.51 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
2.23 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 10 (P047)

Activity Description: 3' x 6' laminate press with automated resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with automated resin spreader. Company ID is Laminate Press #10.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	14.16 lbs of organic compound (OC) emissions per day and 2.58 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
14.16 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #10 specific emission factor developed by the permittee:
0.59 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
2.58 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 12 (P049)

Activity Description: 3' x 6' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #12.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	13.92 lbs of organic compound (OC) emissions per day and 2.54 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
13.92 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #12 specific emission factor developed by the permittee:
0.58 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
2.54 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 15 (P050)

Activity Description: 3' x 6' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #15.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	8.40 lbs of organic compound (OC) emissions per day and 1.53 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
8.40 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #15 specific emission factor developed by the permittee:
0.35 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
1.53 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 16 (P051)

Activity Description: 3' x 6' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #16.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	16.08 lbs of organic compound (OC) emissions per day and 2.93 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
16.08 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #16 specific emission factor developed by the permittee:
0.67 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
2.93 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 17 (P052)

Activity Description: 3' x 6' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #17.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	14.4 lbs of organic compound (OC) emissions per day and 2.63 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
14.4 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #17 specific emission factor developed by the permittee:
0.60 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
2.63 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 18 (P053)

Activity Description: 3' x 6' laminate press with manual resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with manual resin spreader. Company ID is Laminate Press #18.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	3.36 lbs of organic compound (OC) emissions per day and 0.61 ton per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
3.36 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #18 specific emission factor developed by the permittee:
0.14 lb OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
0.61 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 48 (P059)

Activity Description: 4' x 8' laminate press with automated resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with automated resin spreader. Company ID is Laminate Press #48.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	29.28 lbs of organic compound (OC) emissions per day and 5.34 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
29.28 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #48 specific emission factor developed by the permittee:
1.22 lbs OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
5.34 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Laminate Press 49 (P060)

Activity Description: 4' x 8' laminate press with automated resin spreader used to produce molded, flat sheet composites of polyester resin mixture and fiberglass.

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>
Laminate press with automated resin spreader. Company ID is Laminate Press #49.	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	39.98 lbs of organic compound (OC) emissions per day and 7.30 tons per year of OC. See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each resin batch received for processing;
 - b. the number of pounds of each resin batch received for processing;
 - c. the organic compound content of each resin batch received for processing, in percent by weight;
 - d. the volume of each cleanup material dispensed, in gallons per day;
 - e. the volume of each cleanup material returned, in gallons per day;
 - f. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day (A.III.1.d - A.III.1.e.);
 - g. the organic compound content of each cleanup material, in pounds per gallon; and
 - h. the total organic compound emission rate for all resin batches and cleanup materials, in pounds per day for each resin batch and cleanup material employed as determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the actual OC emissions from this emissions unit exceeded the pounds per day limit, and the actual OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
39.38 lbs/day of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000 and 10/09/2001:

- i. Determination of OC emission rates for all lamination production:

Laminate Press #49 specific emission factor developed by the permittee:
1.67 lbs OC per hour of operation.

EI = The summation of the hourly OC emission rates of each lamination product made each day, in lbs OC/day, based upon the above table of emission factors and the record keeping requirements in Section A.III.1.

- ii. Determination of daily OC emissions for all cleanup materials:

Ec = Summation of the daily OC emissions resulting from the use of cleanup solvent materials based upon the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

iii. Determination of total daily OC emissions for this emissions unit resulting from lamination production and cleanup materials used:

$$E(\text{Total}) = E_i + E_c$$

where: $E(\text{Total})$ = Emission rate, lbs OC/day

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corp.

- 1.b** Emission Limitation:
7.30 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2485 issued 07/29/1992.
2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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: Shar Mixer System (P061)

Activity Description: Single mixer with dual resin pots used to produce both slurry and master mixes that are used as components for production of Bulk Molding Compound.

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>
Shar mixer system.	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr and 40.0 lbs pr day of organic compound (OC) emissions (cleanup included).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification for each mold compound and mix manufactured, and each cleanup material employed;
 - b. the number of pounds of each mold compound and mix manufactured;
 - c. the volume of each cleanup material dispensed, in gallons per day;
 - d. the volume of each cleanup material returned, in gallons per day;
 - e. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - f. the OC content of each cleanup material, in pounds per gallon;
 - g. the total number of batches of mold compounds and mixes produced per day;
 - h. the total number of hours of operation per day; and
 - i. the daily and average hourly OC emission rates for all resin batches and cleanup, in pounds per hour and pounds per day as determined in Section A.V.1.a.
- 2.a Monitoring: Weekly baghouse pressure drop monitoring. Based on manufacturers suggested pressure drop range for baghouse operation.
Record-Keeping: Recording of weekly baghouse pressure drop monitoring.
- 3.a Monitoring: Hourly and daily OC emissions will be calculated based on Glastic derived emission factors. Additionally, should process modifications be planned which would require a permit modification, Glastic will inform the local air pollution control agency of the impending change and make any necessary permit modifications, as required.
Record-Keeping: Daily production records sufficient to apply Glastic emission factors and calculate resulting daily OC emissions will be calculated and maintained electronically by the facility.
- 4.a Monitoring: Weekly baghouse pressure drop monitoring. Based on manufacturers suggested pressure drop range for baghouse operation.
Record-Keeping: Recording of weekly baghouse pressure drop monitoring.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (DAQ) that specify all exceedances of the following:
 - a. an identification of each day during which the actual OC emissions from this emissions unit exceeded the allowable pounds/hour OC emission limitation, and identify what the actual OC emissions for each such hour; and
 - b. an identification of each day during which the actual OC emissions from this emissions unit exceeded the allowable pounds/day OC emission limitation, and identify what the actual OC emissions for each such day.
2. **None**
3. **None**
4. Quarterly exceedance reports for weekly pressure drop monitoring.

V. Testing Requirements

1. Emission Limitations: 8.0 lbshour and 40.0 lbs/day of OC emissions (including OC emissions from the use of cleanup materials).

Applicable Compliance Method: Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000:

- i. Determination of OC emissions for all mold compounds and mixes:

$$E (\text{mix}) = \text{Summation } (E1 + E2) = \text{Emission rate, lbs OC/day}$$

Where:

$$E1 = \text{head space losses} = \text{Emission rate, lbs OC/day}$$

$$\text{Actual OC concentration, lbs/cu. ft.} = 0.09318 \times (\text{Gaseous vapor pressure}) \times (\text{Vapor molecular weight}) / (\text{Temperature of batch, R})$$

$$E1 = (\text{number of batches/day}) \times (\text{mixer volume, 78 cu. ft./batch}) \times (\text{actual OC concentration, lbs/cu. ft.}) \times (2 \text{ volume changes})$$

$$E2 = \text{film losses} = \text{Emission rate, lbs OC/day}$$

$$E2 = (\text{number of batches/day}) \times (\text{internal mixer area, 84 sq. ft./batch}) \times (\text{film thickness, 0.00167 ft}) \times (\% \text{ monomer, 20})$$

the vapor pressure of styrene is 10 mm Hg, of methyl methacrylate is 60 mm Hg, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 2 mm Hg at 90 degrees Fahrenheit;

the molecular weight of styrene is 104, of methyl methacrylate is 100, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 118;

R is temperature of a batch in degrees Rankin;

Number of batches/day are determined by the record keeping in Section A.III.1;

OC concentration is the sum of the individual monomer concentrations as determined above; and

V. Testing Requirements (continued)

- ii. Determination of OC emissions for all cleanup materials:

Summation [i to z]: $(V_i \times OC_i) = E \text{ (cleanup)} = \text{Emission rate, lbs OC/day}$

Where:

i = Index, 1, 2, 3, ...;

z = number of cleanup materials;

V_i = the volume of evaporated cleanup materials, as specified in Section A.III.1, in gallons per day; and

OC_i = the OC content of cleanup material, as specified in Section A.III.1, in pounds per gallon.

- iii. Determination of OC emissions for all mold compounds, mixes and cleanup materials:

$E \text{ (Total)} = E \text{ (mix)} + E \text{ (cleanup)}$

where:

$E \text{ (total)}$ = Emission rate, lbs OC/day, and

$E \text{ (hourly)}$ = Emission rate (average) in lbs OC/hour

the average hourly emission rate shall be determined by dividing $E \text{ (total)}$ by the number of hours of operation for each day.

VI. Miscellaneous Requirements

1. N/A. Source is in compliance
2. N/A. Source is in compliance
3. N/A. Source is in compliance
4. N/A. Source is in compliance

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>
---	---	--

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: L600 Mixer (P062)

Activity Description: Littleford Mixer. 600 liter mixer used for making Bulk Molding Compound.

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>
Littleford mixer.	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr and 40.0 lbs pr day of organic compound (OC) emissions (cleanup included).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the company identification for each mold compound and mix manufactured, and each cleanup material employed;
 - b. the number of pounds of each mold compound and mix manufactured;
 - c. the volume of each cleanup material dispensed, in gallons per day;
 - d. the volume of each cleanup material returned, in gallons per day;
 - e. the volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day;
 - f. the OC content of each cleanup material, in pounds per gallon;
 - g. the total number of batches of mold compounds and mixes produced per day;
 - h. the total number of hours of operation per day; and
 - i. the daily and average hourly OC emission rates for all resin batches and cleanup, in pounds per hour and pounds per day as determined in Section A.V.1.a.
- 2.a Monitoring: Weekly baghouse pressure drop monitoring. Based on manufacturers suggested pressure drop range for baghouse operation.
Record-Keeping: Recording of weekly baghouse pressure drop monitoring.
- 3.a Monitoring: Hourly and daily OC emissions will be calculated based on Glastic derived emission factors. Additionally, should process modifications be planned which would require a permit modification, Glastic will inform the local air pollution control agency of the impending change and make any necessary permit modifications, as required.
Record-Keeping: Daily production records sufficient to apply Glastic emission factors and calculate resulting daily OC emissions will be calculated and maintained electronically by the facility.
- 4.a Monitoring: Weekly baghouse pressure drop monitoring. Based on manufacturers suggested pressure drop range for baghouse operation.
Record-Keeping: Recording of weekly baghouse pressure drop monitoring.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (DAQ) that specify all exceedances of the following:
 - a. an identification of each day during which the actual OC emissions from this emissions unit exceeded the allowable pounds/hour OC emission limitation, and identify what the actual OC emissions for each such hour; and
 - b. an identification of each day during which the actual OC emissions from this emissions unit exceeded the allowable pounds/day OC emission limitation, and identify what the actual OC emissions for each such day.
2. **None**
3. **None**
4. Quarterly exceedance reports for weekly pressure drop monitoring.

V. Testing Requirements

1. Emission Limitations: 8.0 lbshour and 40.0 lbs/day of OC emissions (including OC emissions from the use of cleanup materials).

Applicable Compliance Method: Compliance with the daily OC limitation shall be determined from the following equations, based upon emission factors developed by the permittee and submitted 12/06/2000:

- i. Determination of OC emissions for all mold compounds and mixes:

$E(\text{mix}) = \text{Summation}(E1 + E2) = \text{Emission rate, lbs OC/day}$

Where:

$E1 = \text{head space losses} = \text{Emission rate, lbs OC/day}$

$\text{Actual OC concentration, lbs/cu. ft.} = 0.09318 \times (\text{Gaseous vapor pressure}) \times (\text{Vapor molecular weight}) / (\text{Temperature of batch, R})$

$E1 = (\text{number of batches/day}) \times (\text{mixer volume, 78 cu. ft./batch}) \times (\text{actual OC concentration, lbs/cu. ft.}) \times (2 \text{ volume changes})$

$E2 = \text{film losses} = \text{Emission rate, lbs OC/day}$

$E2 = (\text{number of batches/day}) \times (\text{internal mixer area, 84 sq. ft./batch}) \times (\text{film thickness, 0.00167 ft}) \times (\% \text{ monomer, 20})$

the vapor pressure of styrene is 10 mm Hg, of methyl methacrylate is 60 mm Hg, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 2 mm Hg at 90 degrees Fahrenheit;

the molecular weight of styrene is 104, of methyl methacrylate is 100, and of vinyl toluene (mixture of o-, m-, and p-methyl styrene isomers) is 118;

R is temperature of a batch in degrees Rankin;

Number of batches/day are determined by the record keeping in Section A.III.1;

OC concentration is the sum of the individual monomer concentrations as determined above; and

V. Testing Requirements (continued)

- ii. Determination of OC emissions for all cleanup materials:

Summation [i to z]: $(V_i \times OC_i) = E \text{ (cleanup)} = \text{Emission rate, lbs OC/day}$

Where:

i = Index, 1, 2, 3, ...;

z = number of cleanup materials;

V_i = the volume of evaporated cleanup materials, as specified in Section A.III.1, in gallons per day; and

OC_i = the OC content of cleanup material, as specified in Section A.III.1, in pounds per gallon.

- iii. Determination of OC emissions for all mold compounds, mixes and cleanup materials:

$E \text{ (Total)} = E \text{ (mix)} + E \text{ (cleanup)}$

where:

$E \text{ (total)}$ = Emission rate, lbs OC/day, and

$E \text{ (hourly)}$ = Emission rate (average) in lbs OC/hour

the average hourly emission rate shall be determined by dividing $E \text{ (total)}$ by the number of hours of operation for each day.

VI. Miscellaneous Requirements

1. N/A. Source is in compliance
2. N/A. Source is in compliance
3. N/A. Source is in compliance
4. N/A. Source is in compliance

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>
---	---	--

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: Tote Filling - Cold Room (P063)

Activity Description: Resin totes are filled in this process via closed hose and resin filter systems. Totes are covered and vapors are filtered to filter house as tote is filled.

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>
Cold room tote filling station	OAC rule 3745-31-05(A)(3) (PTI 13-03893)	0.63 lb/hr and 2.76 tons/yr of organic compound (OC) emissions (cleanup included). See A.I.2.a below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart WWWW.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no objectionable odors emitted from this emissions unit which cause a nuisance condition pursuant to OAC rule 3745-15-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
 - a. the types of solvents employed in the tote filling;
 - b. a log of the actual hours that the emissions unit was in operation;
 - c. a log of the actual number of totes filled per day; and
 - d. the average hourly emission rate determined from Section A.V.1.a.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify each day during which the average hourly OC emissions from the mixes, mold compounds and cleanup materials exceeded the pounds per hour limit, and the actual average hourly OC emissions for each such day.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the emission factors are mutually agreeable to the Ohio Environmental Protection Agency (Ohio EPA) through the Cleveland DAQ and to Glastic Corporation.

- 1.a Emission Limitation:
0.63 lb/hr of OC emissions (cleanup included).

Applicable Compliance Method:

To determine the actual daily OC emission rate, the following equation, based upon emission factors developed by the permittee and submitted 12/06/2000, shall be used:

$$E = (0.21 \text{ lb OC/totes filled}) \times (\text{totes filled/day}) \times (1 \text{ day/hours of operation})$$

where E = OC emission rate, lbs/hr;

the number of totes filled/day shall be determined by the record keeping as specified in Section A.III.1.c.; and

the hours of operation/day shall be determined by the record keeping as specified in Section A.III.1.b.

- 1.b Emission Limitation:
2.76 tons/yr of OC emissions (cleanup included).

Applicable Compliance Method:

Compliance with the yearly OC emission rate shall be determined by summing the daily emissions rate determined by the record keeping as specified in Section A.III.1.h., and dividing by 2000 lbs/ton for each calendar year.

VI. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 13-2561 issued 9/9/1993.

VI. Miscellaneous Requirements (continued)

2. In order to limit the objectionable odorous emissions to within the fence line of the permittee's premise, the permittee shall maintain on-going process improvement and work practice programs aimed at minimizing emissions. Should objectionable odors be reported the following contingency plan shall be implemented.

The Cleveland DAQ shall investigate, verify and resolve all valid odor complaints. The permittee may in cooperation with the Cleveland DAQ investigate, verify and resolve all valid odor complaints.

The Cleveland DAQ shall determine the validity of an odor complaint. If the odor complaint is valid, the permittee shall take necessary corrective actions to resolve the condition.

If the permittee disagrees with the Cleveland DAQ's determination, the permittee may present evidence to the contrary or in support of Cleveland DAQ's determination within 30 days of the receipt of the determination.

Corrective actions shall be taken in the following order:

- a. Confirm equipment, prevention methods and work practices are in place. Correct as needed.
- b. If necessary, install a stack or stacks as per air dispersion modeling.
- c. If necessary, conduct analysis and install an alternative/improved equipment control device to reduce odors.

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>
---	---	--

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

THIS IS THE LAST PAGE OF THE PERMIT
