

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **08-04374**

**A. Source Description:**

Retterbush Injection Molded Fiberglass, Inc. is a reinforced plastic composite manufacturing facility (job shop). This PTI (08-4374) is a modification of previous PTIs (08-03002 and 08-02004) for emissions units P003, P004, and P005 to limit HAP emissions (styrene) below major source levels. Emissions unit P003 is a hand layup (using rollers and brushes) and spray layup booth (using chopper guns) for styrene resins application over fiberglass strands. Emissions unit P004 is used for the Resin Transfer Molding (RTM) and Low Pressure Molding Compound (LPMC) processes. Emissions unit P005 is a gel coat booth where clear or colored resin surface coats are applied for cosmetic enhancement or weatherability of a fiberglass laminant.

**B. Facility Emissions and Attainment Status:**

The facility is located in Miami County which is currently designated as attainment status for all criteria pollutants. The facility's potential to emit is less than 100 tons for criteria pollutants and less than 25 tons per year for combined HAPs. The facility has a potential to emit greater than 10 tons per year of an individual HAP (styrene). Retterbush previously qualified for exemption from major source operating permits under the U.S. EPA transition policy (which expired at the end of 2000) that allowed sources with actual emissions below 50% of major source levels to operate as minor sources. Reported annual styrene emissions from Retterbush have been below four tons per year since the first emissions unit was installed in 1988. The highest annual styrene emissions level reported was 3.8 tons for calendar year 1998. Annual styrene emissions for the year 2000 and 2001 were 2.6 and 2.8 tons respectively. Retterbush has no air emissions controls and has submitted a PTI modification to become a synthetic minor source in compliance with Title V operating permit requirements and a synthetic area source under the proposed reinforced plastic composites MACT (subpart WWWW).

**C. Source Emissions:**

Retterbush has proposed to limit the annual use of resins and the styrene concentrations of the resins to maintain emissions below major source levels. Retterbush has proposed to limit resin use to 141 tons and styrene concentration to 34% in P003; 113 tons and 45% styrene concentration in P004; and gel coat use to 18 tons and 36% styrene concentration in P005.

**D. Conclusion:**

The self-imposed annual material use and styrene concentration limits combined with the record keeping requirements will ensure that styrene emissions from Retterbush will not exceed 9.9 tons per year. Therefore, Retterbush will not be a major facility subject to Title V operating permit requirements or the proposed reinforced plastic composites MACT (subpart WWWW).

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

**RE: DRAFT PERMIT TO INSTALL  
MIAMI COUNTY  
Application No: 08-04374**

**CERTIFIED MAIL**

**DATE:** 4/23/2002

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

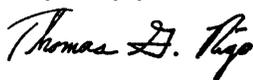
Retterbush Injection Molded Fiberglass  
Mike Palsgrove  
PO Box 207 719 Long Drive  
Piqua, OH 45356-9262

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,



Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN



**Permit To Install**

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

**Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 08-04374**

Application Number: 08-04374

APS Premise Number: 0855100393

Permit Fee: **To be entered upon final issuance**

Name of Facility: Retterbush Injection Molded Fiberglass

Person to Contact: Mike Palsgrove

Address: PO Box 207 719 Long Drive  
Piqua, OH 45356-9262

Location of proposed air contaminant source(s) [emissions unit(s)]:

**719 Long Dr  
Piqua, Ohio**

Description of proposed emissions unit(s):

**modification of P003, P004, P005; chapter 31 replacing 08-03002 issued 11-6-01 and 08-02004 issued 5-10-91.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**Facility ID: 0855100393**

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days

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after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	16.8

**Retterbush Injection Molded Fiberglass**  
**PTI Application: 08-04374**  
**Issued: To be entered upon final issuance**

**Facility ID: 0855100393**  
**Emissions Unit ID: P003**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Resin sprayup and hand layup booth. Modification*	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  6.29 TPY organic compounds (OC), excluding cleanup.
	OAC rule 3745-35-07(B)	9.34 TPY OC, including non-photochemically reactive cleanup material.
	OAC rule 3745-21-07(G)(2)	6.2 TPY styrene, on a 12-month rolling basis.  8 lbs/ hour and 40 lbs/day OC, excluding cleanup.

2. **Additional Terms and Conditions**

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

**B. Operational Restrictions**

1. Resin use in this emissions unit shall not exceed 141 tons per year based on a rolling 12-month summation. To ensure enforceability during the first 12 calendar months following issuance of this permit the permittee shall not exceed the production levels specified in the following table:

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**Emissions Unit ID: P003**

<u>Month</u>	<u>Maximum Allowable Cumulative Resin Use</u>
1	11.75 tons
1-2	23.50 tons
1-3	35.25 tons
1-4	47.00 tons
1-5	58.75 tons
1-6	70.50 tons
1-7	82.25 tons
1-8	94.00 tons
1-9	105.75 tons
1-10	117.5 tons
1-11	129.25 tons
1-12	141.00 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance shall be based on upon a rolling 12 month summation of the production rates.

2. The concentration of styrene in the resins applied in this emissions unit shall not exceed 34% and an emission factor of 89 pounds styrene per ton of resin applied in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
3. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information for each month, for each resin and catalyst employed in this emissions unit:
  - a. The company identification for each resin and catalyst employed.
  - b. The total number of gallons of each resin and catalyst employed.
  - c. The organic compound content of each resin and catalyst, in pounds per gallon.

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**Facility ID: 0855100393**  
**Emissions Unit ID: P003**

- d. The method of application for each resin employed.
  - e. The styrene content of each resin employed, in percent by weight.
  - f. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
  - g. The total number of days the emissions unit was in operation.
  - h. The average daily organic compound emission rate, in pounds per day (i.e., (f)/(g)).
  - i. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12 month summation of resin use in this emissions unit. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.
2. The permittee shall collect and record the following information each month for this emissions unit:
- a. The company identification of each cleanup material employed in this emissions unit.
  - b. Whether or not each cleanup material employed is a photochemically reactive material.
  - c. The total number of gallons of cleanup material employed.
  - d. The organic compound content of each cleanup material, in pounds per gallon.
  - e. The total organic compound emission rate from all resins, catalysts, and cleanup materials employed, in pounds per month.

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

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. each month that the average daily organic compound emissions from the resin and catalyst use exceeded 40 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. each month that the 12 month rolling summation of resin use in this emissions unit exceeds 141 tons. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative production levels.
  - c. any resins applied in this emissions unit with a styrene concentration that exceeds 34%.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

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**Emissions Unit ID: P003**

2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.
3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
  - a. The total organic compound emissions in tons and styrene emissions in tons from resin and catalyst usage.
  - b. The total organic compound emissions in tons from cleanup materials employed in this emissions unit.
  - c. The total combined organic compound emissions from resin usage, catalyst usage and cleanup materials employed in this emissions unit.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
8 lbs/hour organic compounds, excluding cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined as follows:
    - i. The usage of each resin (gallons per month) shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (not to exceed 89 lbs styrene per ton of resin) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
    - ii. The total usage rate of the catalyst (gallons per month) shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
    - iii. The total hourly organic compound emission rate (in pounds) shall then be the sum of the results from i and ii above, divided by the total number of hours the emissions unit was in operation for the month.

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**Emissions Unit ID: P003**

- b. Emission Limitation -  
40 lbs/day organic compounds, excluding cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

- i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
- ii. The total usage rate of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total organic compound emission rate (in pounds), excluding cleanup, shall then be the sum of the results from i and ii above, divided by the total number of days the emissions unit was in operation for the month.

- c. Emission Limitation -  
6.29 TPY OC, excluding cleanup  
3.05 TPY OC from cleanup

9.34 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

- d. Emission Limitation -  
6.2 TPY styrene

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly styrene emission rates for the previous 12 months, divided by 2,000 pounds per ton.

## **F. Miscellaneous Requirements**

- 1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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**Emissions Unit ID: P003**

2. This PTI is a modification of PTI 08-03002 issued January 24, 1991 and previously modified on November 26, 2001 (administrative modification to properly reflect cleanup material use). This modification represents an organic compound emissions increase for this emissions unit. The adjustment in organic compound emissions allows for production increases in this emissions unit and the other two emissions units at the facility while maintaining styrene emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

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**Facility ID: 0855100393**  
**Emissions Unit ID: P004**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Low Pressure Molding Compound (LPMC) and Resin Transfer Molding (RTM) Modification*	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  0.51 TPY organic compounds (OC) excluding cleanup.
	OAC rule 3745-35-07(B)	3.56 TPY OC including non-photochemically reactive cleanup material.  0.51 TPY styrene on a 12-month rolling summation.
	OAC rule 3745-21-07(G)(2)	8 lbs/ hour and 40 lbs/day OC, excluding cleanup.

2. **Additional Terms and Conditions**

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

**B. Operational Restrictions**

1. RTM compound and LPMC use in this emissions unit shall not exceed 113 tons per year on a rolling 12-month summation. To ensure enforceability during the first 12 calendar months following issuance of this permit the permittee shall not exceed the production levels specified in the following table:

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**Emissions Unit ID: P004**

<u>Month</u>	<u>Maximum Allowable Cumulative RTM and LPMC Use</u>
1	9.41 tons
1-2	18.82 tons
1-3	28.23 tons
1-4	37.64 tons
1-5	47.05 tons
1-6	56.46 tons
1-7	65.87 tons
1-8	75.28 tons
1-9	84.69 tons
1-10	94.10 tons
1-11	103.5 tons
1-12	113.0 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance shall be based on upon a rolling 12 month summation of the production rates.

2. The concentration of styrene in the RTM compound and LPMC used in this emissions unit shall not exceed 45% and an emission factor of 9 pounds styrene per ton of resin used; in accordance with emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding.
3. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information for each month for each resin, molding compound and catalyst employed in this emissions unit:
  - a. The company identification for each resin, molding compound and catalyst employed.
  - b. The total number of gallons of each resin and catalyst employed and the tons of molding compound used.

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- c. The organic compound content of each resin, molding compound and catalyst, in pounds per gallon or pounds per ton.
  - d. The method of use for each resin and molding compound employed (RTM or LPMC).
  - e. The styrene content of each resin and molding compound employed, in percent by weight.
  - f. The total organic compound emissions from all resins, molding compounds and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
  - g. The total number of days the emissions unit was in operation.
  - h. The average daily organic compound emission rate, in pounds per day (i.e., (f)/(g)).
  - i. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12 month summation of resin use in this emissions unit. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.
2. The permittee shall collect and record the following information each month for this emissions unit:
- a. The company identification of each cleanup material employed in this emissions unit.
  - b. Whether or not each cleanup material employed is a photochemically reactive material.
  - c. The total number of gallons of cleanup material employed.
  - d. The organic compound content of each cleanup material, in pounds per gallon.
  - e. The total organic compound emission rate from all resins, catalysts, and cleanup materials employed, in pounds per month.

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

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. each month that the average daily organic compound emissions from the resin and catalyst exceeded 40 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. each month that the 12 month rolling summation of resin and molding compound use in this emissions unit exceeds 113 tons. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative production levels.
  - c. any resins applied in this emissions unit with a styrene concentration that exceeds 45%.

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The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.
3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
  - a. The total organic compound emissions and styrene emissions from resin and molding compound usage.
  - b. The total organic compound emissions from cleanup materials employed in this emissions unit.
  - c. The total combined organic compound emissions from resin use, molding compound use and cleanup materials employed in this emissions unit.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
8 lbs/hour organic compounds, excluding cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined as follows:
    - i. The usage of each resin (gallons per month) shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each molding compound in pounds per month. The combined usage of each resin and molding compound, in tons, shall then be multiplied by the appropriate emission factor (in lbs of styrene/ton of resin or molding compound used) in accordance with emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding.
    - ii. The total usage rate of the catalyst (gallons per month) shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.

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iii. The total hourly organic compound emission rate (in pounds) shall then be the sum of the results from i and ii above, divided by the total number of hours the emissions unit was in operation for the month.

b. Emission Limitation -  
40 lbs/day organic compounds, excluding cleanup

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

i. The usage of each resin (gallons per month) shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each molding compound in pounds per month. The combined usage of each resin and molding compound, in tons, shall then be multiplied by the appropriate emission factor (in lbs of styrene/ton of resin or molding compound used) in accordance with emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding.

ii. The total usage rate of the catalyst (gallons per month) shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.

iii. The total organic compound emission rate (in pounds), excluding cleanup, shall then be the sum of the results from i and ii above, divided by the total number of days the emissions unit was in operation for the month.

c. Emission Limitation -  
0.51 TPY OC, excluding cleanup  
3.05 TPY OC from cleanup

3.56 TPY OC, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly organic compound emission rates (pounds per month) for the previous 12 months, divided by 2,000 pounds per ton.

d. Emission Limitation -  
0.51 TPY styrene

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Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly styrene emission rates (pounds per month) for the previous 12 months, divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification of PTI 08-03002 issued January 24, 1991 and previously modified on November 26, 2001 (administrative modification to properly reflect cleanup material use). This modification represents an annual organic compound emissions decrease for this emissions unit. The adjustment in organic compound emissions allows for production increases in this emissions unit and the other two emissions units at the facility while maintaining HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Gel Coat Booth for FRP Modification*	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B)	3.9 TPY organic compounds (OC).
	OAC rule 3745-21-07(G)(2)	3.2 TPY styrene, on a 12-month rolling summation.  8 lbs/ hour and 40 lbs/day OC, excluding cleanup.

2. **Additional Terms and Conditions**

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

**B. Operational Restrictions**

1. Resin use in this emissions unit shall not exceed 18.0 tons per year on a rolling 12-month summation. To ensure enforceability during the first 12 calendar months following issuance of this permit the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Resin Use</u>
1	1.5
1-2	3.0 tons
1-3	4.5 tons

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1-4	6.0 tons
1-5	7.5 tons
1-6	9.0 tons
1-7	10.5 tons
1-8	12.0 tons
1-9	13.5 tons
1-10	15.0 tons
1-11	16.5 tons
1-12	18.0 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance shall be based on upon a rolling 12 month summation of the production rates.

2. The concentration of styrene in the gelcoats applied in this emissions unit shall not exceed 36% and an emission factor of 356 pounds styrene per ton of gelcoat in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
3. The concentration of methyl methacrylate in the gelcoats applied shall not exceed 5% and an emissions factor of 75 pounds of methyl methacrylate per ton of gelcoat in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

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

1. The permittee shall collect and record the following information for each month for each resin and catalyst employed in this emissions unit:
  - a. The company identification for each gelcoat and catalyst employed.
  - b. The total number of gallons of each gelcoat and catalyst employed.
  - c. The organic compound content of each gelcoat and catalyst, in pounds per gallon.
  - d. The method of application for each gelcoat employed.
  - e. The styrene and methyl methacrylate content of each resin employed, in percent by weight.
  - f. The total organic compound emissions from all gelcoats and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).

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- g. The total number of days the emissions unit was in operation.
- h. The average daily organic compound emission rate, in pounds per day.
- i. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12 month summation of resin use in this emissions unit. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.
- j. The company identification of any cleanup material employed in this emissions unit and whether or not they are considered photochemically reactive materials.

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

- 1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. each month that the average daily organic compound emissions from the gelcoat and catalyst use exceeded 40 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. each month that the 12 month rolling summation of gelcoat use in this emissions unit exceeds 18.0 tons. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative production levels.
  - c. any gelcoat applied in this emissions unit with a styrene concentration that exceeds 36% or a methyl methacrylate concentration that exceeds 5%.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

- 2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.
- 3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
  - a. The total organic compound emissions in tons, styrene emissions in tons, and methyl methacrylate in tons from gelcoat usage.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

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

a. Emission Limitation -  
8 lbs/hour organic compounds, excluding cleanup

Applicable Compliance Method -  
Compliance shall be determined as follows:

- i. The usage of each gelcoat (gallons per month) shall be multiplied by the gelcoat density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each gelcoat, in tons, shall then be multiplied by the appropriate emission factor (not to exceed 356 lbs styrene or 75 lbs of methyl methacrylate per ton of gelcoat) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
- ii. The total usage rate of the catalyst (gallons per hour) shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total hourly organic compound emission rate (in pounds) shall then be the sum of the results from i and ii above divided by the total number of hours the emissions unit was in operation for the month.

b. Emission Limitation -  
40 lbs/day organic compounds, excluding cleanup

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

- i. The usage of each gelcoat (gallons per month) shall be multiplied by the gelcoat density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each gelcoat, in tons, shall then be multiplied by the appropriate emission factor (not to exceed 356 lbs styrene or 75 lbs of methyl methacrylate per ton of gelcoat) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
- ii. The total usage rate of the catalyst (gallons per hour) shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total hourly organic compound emission rate (in pounds) shall then be the sum of the results from i and ii above divided by the total number of days the emissions unit was in operation for the month. .

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- c. Emission Limitation -  
3.9 TPY OC

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

- d. Emission Limitation -  
3.2 TPY styrene

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2. and shall be the rolling summation of the monthly styrene emission rates for the previous 12 months, divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification of PTI 08-03002 issued July 18, 1990. This modification represents an organic compound emissions increase for this emissions unit. The adjustment in organic compound emissions allows for production increases in this emissions unit and the other two emissions units at the facility while maintaining HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.