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

Permit To Install 14-05223

A. Emissions Units Description

The Permit to Install (PTI 14-4493) covers 1 gel coating and 2 glass chop application booths. This facility manufactures fiberglass truck body parts and is designated a major source for Hazardous Air Pollutants and, through this synthetic minor PTI, a minor source for Organic Compounds (OC's).

B. Facility Emissions and Attainment Status

Cincinnati Fiberglass was a minor stationary source for OC's at the time they installed these emissions units. This facility is located in Clermont County. Clermont County is designated as attainment for PM/PM_{10}, SO_2, NOx and CO and is designated non-attainment for OC. The permittee wishes to incorporate federally enforceable limitations in the PTI limiting OC emissions to less than 100 TPY.

C. Source Emissions

The potential emissions from these emissions units in the absence of this federally enforceable PTI are calculated at 114.6 TPY of OC's for the whole facility. The emission limitations outlined in this PTI limit OC emissions to 69.0 TPY for all three booths. The permittee will record coating usage and styrene contents and submit reports as described in the PTI's terms and conditions to ensure compliance with the permit limitations.

D. Conclusion

The terms and conditions in this PTI limit the permittee's potential OC emissions to less than 100 TPY. The permittee will maintain usage records and submit reports as outlined in the terms and conditions for all emissions units to demonstrate compliance with the production and emission limitations. Because the allowable OC emissions are less than 100 TPY, the permittee will not be subject to the requirements of the Emissions Offset Policy.

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
CLERMONT COUNTY
Application No: 14-05223

DATE: 11/29/2001

CERTIFIED MAIL

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

Cincinnati Fiberglass
John Glass
4174 Half Acre Road
Batavia, OH 45103

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 of 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
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA HCDES Ohio-Kentucky-Indiana Reg Coun of Gov KY IN

DRAFT PERMIT TO INSTALL 14-05223

Application Number: 14-05223

APS Premise Number: 1413020248

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

Name of Facility: Cincinnati Fiberglass

Person to Contact: John Glass

Address: 4174 Half Acre Road
Batavia, OH 45103

Location of proposed air contaminant source(s) [emissions unit(s)]:
4174 Half Acre Road
Batavia Ohio, Ohio

Description of proposed emissions unit(s):
Modification of PTI 14-04493 for one robot gel coat applicator and two robot spray chop applicators issued on 7/19/01.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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.

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, 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.10 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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. 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.

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 are true, accurate, and complete.

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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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.

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. 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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.

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.

10. Permit To Operate Application

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

11. 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.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. Construction of New Sources(s)

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

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

7. 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.

8. 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).

9. 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.

10. 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.

C. 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

Pollutant	Tons Per Year
OC	69.0
PM/PM-10	6.14

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P022 - Robotic Gel Coat Applicator Booth - Modification	OAC rule 3745-31-05(A)(3)	0.39 lb/hr PM/PM_{10} 6.07 lbs/day PM/PM_{10} 0.60 TPY PM/PM_{10} The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g) and OAC rule 3745-17-07(A)(1).
	OAC rule 3745-21-07(G)(9)(g)	10.0 lbs/hr OC from coatings 157 lbs/day OC from coatings 15.5 TPY OC from coatings* 13.2 lbs/day acetone 1.16 TPY acetone*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11 Table I	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). * Based on a rolling 12- month summation.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the gel coat usage limits, cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of acetone used in emissions unit P022 shall not exceed 2.0 gallons/day and 350 gallons/year.

2. The styrene content of the gel coats shall not exceed the following limitations:
(gel coat is a polyester resin surface coating, either pigmented or clear, that provides a cosmetic enhancement and improves resistance to degradation from exposure to the elements)

   a. 50% by weight as applied for each clear gel coat; and
   (clear gel coat is gel coat without pigment)

   b. 45% by weight as applied for each pigmented gel coat
   (pigmented gel coat is clear gel coat with pigments added).

3. The amount of gel coat (coating) used in emissions unit P022 shall not exceed 144 pounds/hour, 2,248 pounds/day and 220.95 tons/year. The tons/year limit is based upon a rolling, 12-month summation.

4. The permittee shall electronically monitor the amount of coating pumped by emissions unit P022.

5. The permittee shall only employ nonphotochemically reactive cleanup materials in emissions unit P022.

6. The permittee shall only employ acetone as the cleanup material in emissions unit P022 which has a density of 6.6 pounds OC/gallon, as applied.

7. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P022.

8. The permittee shall only utilize Robotic Application Equipment in emissions unit P022**.**

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P022:

   a. The company identification for each polyester resin material (gel coat/ coating) and cleanup material employed.

   b. The type of gel coat used (clear gel coat or pigmented gel coat).

   c. The number of pounds of each coating material employed.

   d. The percent styrene of each coating employed in this emissions unit.

   e. The number of gallons of acetone employed.

f. The organic compound content of acetone, in pounds per gallon.

g. The total organic compound emission rate for all coatings, in pounds per day.

h. The total acetone emission rate, in pounds per day.

i. The total number of hours the emissions unit was in operation.

j. The average hourly organic compound emission rate for all coatings, in pounds per hour (g/i).

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

2. The permittee shall maintain monthly records of the following information for emissions unit P022:

a. the coating (gel coat) usage for each month;

b. the rolling, 12-month summation of the coating usage figures; and

c. the rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P022:

a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 10.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the coatings exceeded 157 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1 and A.II.3.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limits in term A.II.2.

4. Quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

5. The permittee shall submit annual reports which specify the updated rolling, 12-month summation of the organic compound emissions for each month from emissions unit P022 for the previous calendar year. These reports shall be submitted by January 30 of each year.

V. Testing Requirements

1. Compliance with the opacity limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, method 9.

2. Compliance with the OC emission limitations for emissions unit P022 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated April 7, 1999) as follows:

   a. #/hr OC emissions = # gel coat/hr X emission factor X Ton/2000 #

   b. #/day OC emissions = # gel coat/day X emission factor X Ton/2000 #

   c. Ton per year OC emissions = Tons of gel coat/year* X emission factor X Ton/2000 #

      * Based on a rolling 12-month summation.

3. Compliance with the particulate emission rate shall be demonstrated by the following:

   a. Lbs/hr. = # gel coat/hr x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   b. Lbs/day = # gel coat/day x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   c. TPY = # gel coat/year x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency) X ton/2000 lbs.

4. Compliance with the usage restrictions in T&C A.II.1 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1. and A.III.2.

5. The percent styrene content shall be determined by formulation data, USEPA Reference Method 24 or USEPA Method 311. When Method 24 is used, the weight percent monomer shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a dispute between the formulation data and Method 24, the results obtained by Method 24 shall be used and supersede the formulation data. In the event of a dispute between the formulation data, Method 24 and/or Method 311, the results obtained by Method 311 shall be used and supersede the formulation data and/or the Method 24 test results. An alternative method may be substituted if agreed to in writing by USEPA.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI)14-04493 issued on July 19, 2001.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P022 - Robotic Gel Coat Applicator Booth - Modification	None	See Term B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P022 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Styrene

   TLV (ug/m3): 85,000

   Total Maximum Hourly Emission Rate for all three emissions units (lbs/hr): 47

   Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1220

   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2024

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P023 - Robotic Spray Chop Booth 1 - Modification	OAC rule 3745-31-05(A)(3)	2.05 lbs/hr PM/PM_{10} 22.9 lbs/day PM/PM_{10} 2.77 TPY PM/PM_{10} The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g) and OAC rule 3745-17-07(A)(1).
	OAC rule 3745-21-07(G)(9)(g)	18.5 lbs/hr OC from coatings 208 lbs/day OC from coatings 25.0 TPY OC from coatings* 13.2 lbs/day acetone 1.16 TPY acetone*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11 Table I	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). * Based on a rolling 12- month summation.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the resin usage limits, cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of acetone used in emissions unit P023 shall not exceed 2.0 gallons/day and 350 gallons/year.

2. The styrene content of the neat resin shall not exceed the following limitations:

   a. 48% by weight as applied for each corrosion resistant material;
   (Corrosion resistant materials are polyester resin materials used to make products for corrosion resistant applications such as tooling, fuel or chemical tanks and boat hulls.)

   b. 42% by weight as applied for each fire retardent material; and
   (Fire retardent materials are polyester resin materials used to make products resistant to flame or fire.)

   c. 38% by weight as applied for all other materials.

3. The amount of neat resin (coating) used in emissions unit P023 shall not exceed 840.9 pounds/hour, 9,412 pounds/day and 1135 tons per year. The tons/year limit is based upon a rolling, 12-month summation.

4. The permittee shall electronically monitor the amount of coating pumped by emissions unit P023.

5. The permittee shall only employ nonphotochemically reactive cleanup materials in emissions unit P023.

6. The permittee shall only employ acetone as the cleanup material in P023 which has density of 6.6 pounds /gallon, as applied.

7. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P023.

8. The permittee shall only utilize Robotic Application Equipment in emissions unit P023.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P023:

   a. The company identification for each resin material (neat resin/coating) and cleanup material employed.

   b. The type of coating used (fire retardent or corrosion resistant).

   c. The number of pounds of each coating material employed.

d. The percent styrene of each coating employed in this emissions unit.

e. The number of gallons of acetone employed.

f. The organic compound content of acetone, in pounds per gallon.

g. The total organic compound emission rate for all coatings, in pounds per day.

h. The total acetone emission rate, in pounds per day.

i. The total number of hours the emissions unit was in operation.

j. The average hourly organic compound emission rate for all coatings, in pounds per hour (g/i).

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

2. The permittee shall maintain monthly records of the following information for emissions unit P023:

a. the coating (neat resin) usage for each month;

b. the rolling, 12-month summation of the coating usage figures; and

c. the rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P023:

a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 18.5 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the coatings exceeded 208 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1 and A.II.3.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limits in term A.II.2.

4. Quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

5. The permittee shall submit annual reports which specify the updated rolling, 12-month summation of the organic compound emissions for each month from emissions unit P023 for the previous calendar year. These reports shall be submitted by January 30 of each year.

V. Testing Requirements

1. Compliance with the opacity limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, method 9.

2. Compliance with the OC emission limitations for emissions unit P023 shall be demonstrated by multiplying the amount of resin used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated April 7, 1999) as follows:

   a. #/hr OC emissions = # resin/hr X emission factor X Ton/2000 #

   b. #/day OC emissions = # resin/day X emission factor X Ton/2000 #

   c. Ton per year OC emissions = Tons of resin/year** X emission factor X Ton/2000 #

      ** Based on a rolling 12-month summation.

3. Compliance with the particulate emission rate shall be demonstrated by the following:

   a. Lbs/hr. = # resin/hr x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   b. Lbs/day = # resin/day x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   c. TPY = # resin/year x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency) X ton/2000 lbs.

4. Compliance with the usage restrictions in T&C A.II.1 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1. and A.III.2.

5. The percent styrene content shall be determined by formulation data, USEPA Reference Method 24 or USEPA Method 311. When Method 24 is used, the weight percent monomer shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a dispute between the formulation data and Method 24, the results obtained by Method 24 shall be used and supersede the formulation data. In the event of a dispute between the formulation data, Method 24 and/or Method

311, the results obtained by Method 311 shall be used and supersede the formulation data and/or the Method 24 test results. An alternative method may be substituted if agreed to in writing by USEPA.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI)14-04493 issued on July 19, 2001.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P023 - Robotic Spray Chop Booth 1 - Modification	None	See Term B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P023 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Styrene

   TLV (ug/m3): 85,000

   Total Maximum Hourly Emission Rate for all three emissions units (lbs/hr): 47

   Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1220

   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2024

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P024 - Robotic Spray Chop Booth 2 - Modification	OAC rule 3745-31-05(A)(3)	2.05 lbs/hr PM/PM_{10} 22.9 lbs/day PM/PM_{10} 2.77 TPY PM/PM_{10} The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g) and OAC rule 3745-17-07(A)(1).
	OAC rule 3745-21-07(G)(9)(g)	18.5 lbs/hr OC from coatings 208 lbs/day OC from coatings 25.0 TPY OC from coatings* 13.2 lbs/day acetone 1.16 TPY acetone*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11 Table I	The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). * Based on a rolling 12- month summation

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the resin usage limits, cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of acetone used in emissions unit P024 shall not exceed 2.0 gallons/day and 350 gallons/year.

2. The styrene content of the neat resin shall not exceed the following limitations:

   a. 48% by weight for each corrosion resistant material;
   (Corrosion resistant materials are polyester resin materials used to make products for corrosion resistant applications such as tooling, fuel or chemical tanks and boat hulls.)

   b. 42% by weight for each fire retardent material; and
   (Fire retardent materials are polyester resin materials used to make products resistant to flame or fire.)

   c. 38% by weight for all other materials.

3. The amount of neat resin (coating) used in emissions unit P024 shall not exceed 840.9 pounds/hour, 9,412 pounds/day and 1135 tons per year. The tons/year limit is based upon a rolling, 12-month summation.

4. The permittee shall electronically monitor the amount of coating pumped by emissions unit P024.

5. The permittee shall only employ nonphotochemically reactive cleanup materials in emissions unit P024.

6. The permittee shall only employ acetone as the cleanup material in P024 which has density of 6.6 pounds /gallon, as applied.

7. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P024.

8. The permittee shall only utilize Robotic Application Equipment in emissions unit P024.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P024:

   a. The company identification for each resin material (neat resin/coating) and cleanup material employed.

   b. The type of coating used (fire retardent or corrosion resistant)

   c. The number of pounds of each coating material employed.

   d. The percent styrene of each coating employed in this emissions unit.

e. The number of gallons of acetone employed.

f. The organic compound content of acetone, in pounds per gallon.

g. The total organic compound emission rate for all coatings, in pounds per day.

h. The total acetone emission rate, in pounds per day.

i. The total number of hours the emissions unit was in operation.

j. The average hourly organic compound emission rate for all coatings, in pounds per hour (g/i).

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

2. The permittee shall maintain monthly records of the following information for emissions unit P024:

a. the coating (neat resin) usage for each month;

b. the rolling, 12-month summation of the coating usage figures; and

c. the rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P024:

a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 18.5 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the coatings exceeded 208 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1 and A.II.3.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limits in term A.II.2.

4. Quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

5. The permittee shall submit annual reports which specify the updated rolling, 12-month summation of the organic compound emissions for each month from emissions unit P024 for the previous calendar year. These reports shall be submitted by January 30 of each year.

V. Testing Requirements

1. Compliance with the opacity limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, method 9.

2. Compliance with the OC emission limitations for emissions unit P024 shall be demonstrated by multiplying the amount of resin used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated April 7, 1999) as follows:

   a. #/hr OC emissions = # resin/hr X emission factor X Ton/2000 #

   b. #/day OC emissions = # resin/day X emission factor X Ton/2000 #

   c. Ton per year OC emissions = Tons of resin/year** X emission factor X Ton/2000 #

      ** Based on a rolling 12-month summation.

3. Compliance with the particulate emission rate shall be demonstrated by the following:

   a. Lbs/hr. = # resin/hr x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   b. Lbs/day = # resin/day x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency).

   c. TPY = # resin/year x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .985 Control efficiency) X ton/2000 lbs.

4. Compliance with the usage restrictions in T&C A.II.1 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1. and A.III.2.

5. The percent styrene content shall be determined by formulation data, USEPA Reference Method 24 or USEPA Method 311. When Method 24 is used, the weight percent monomer shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a dispute between the formulation data and Method 24, the results obtained by Method 24 shall be used and supersede the formulation data. In the event of a dispute between the formulation data, Method 24 and/or Method 311, the results obtained by Method 311 shall be used and supersede the formulation data and/or the Method 24 test results. An alternative method may be substituted if agreed to in writing by USEPA.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI)14-04493 issued on July 19, 2001.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P024 - Robotic Spray Chop Booth 2 Modification	None	See Term B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P024 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Styrene

   TLV (ug/m3): 85,000

   Total Maximum Hourly Emission Rate for all three emissions units (lbs/hr): 47

   Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1220

   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2024

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-05223 Facility ID: 1413020248

FACILITY NAME Cincinnati Fiberglass

FACILITY DESCRIPTION Modification of PTI 14-04493 for one robot gel coat applicator and two robot spray chop applicators issued on 7/19/01 CITY/TWP Batavia Ohio

SIC CODE 3089 SCC CODE 3-08-007-22 EMISSIONS UNIT ID P022

EMISSIONS UNIT DESCRIPTION Robotic Gel Coat Applicator Booth Modification

DATE INSTALLED 1/96

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.39 lb/hr	0.60	0.39	0.60
PM_{10}	attainment	0.39lb/hr	0.60	0.39	0.60
Sulfur Dioxide					
Organic Compounds	nonattainment	10 lbs/hr	15.5	10 lbs/hr	15.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Gel coat usage, cleanup material usage, OC emission limitations and compliance with the Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: styrene

NEW SOURCE REVIEW FORM B

PTI Number: 14-05223 Facility ID: 1413020248

FACILITY NAME Cincinnati Fiberglass

FACILITY DESCRIPTION Modification of PTI 14-04493 for one robot gel coat applicator and two robot spray chop applicators issued on 7/19/01 CITY/TWP Batavia Ohio

SIC CODE 3089 SCC CODE 3-08-007-22 EMISSIONS UNIT ID P023

EMISSIONS UNIT DESCRIPTION Robotic Spray Chop Booth 1 Modification

DATE INSTALLED 1/96

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	2.05 lbs/hr	2.77	2.05 lbs/hr	2.77
PM_{10}	attainment	2.05 lbs/hr	2.77	2.05 lbs/hr	2.77
Sulfur Dioxide					
Organic Compounds	nonattainment	18.5 lbs/hr	25	18.5 lbs/hr	25
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Resin usage, cleanup material usage, OC emission limitations and compliance with the Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: styrene

NEW SOURCE REVIEW FORM B

PTI Number: 14-05223 Facility ID: 1413020248

FACILITY NAME Cincinnati Fiberglass

FACILITY DESCRIPTION Modification of PTI 14-04493 for one robot gel coat applicator and two robot spray chop applicators issued on 7/19/01

CITY/TWP Batavia Ohio

SIC CODE 3089 SCC CODE 3-08-007-22 EMISSIONS UNIT ID P024

EMISSIONS UNIT DESCRIPTION Robotic Spray Chop Booth 2 Modification

DATE INSTALLED 1/96

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	2.05 lbs/hr	2.77	2.05 lbs/hr	2.77
PM_{10}	attainment	2.05 lbs/hr	2.77	2.05 lbs/hr	2.77
Sulfur Dioxide					
Organic Compounds	nonattainment	18.5 lbs/hr	25	18.5 lbs/hr	25
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Resin usage, cleanup material usage, OC emission limitations and compliance with the Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: styrene