State of Ohio Environmental Protection Agency

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

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

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL
TRUMBULL COUNTY
Application No: 02-22437
Fac ID: 0278080819

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

DATE: 3/6/2007

Rally Time Trailers, Inc.
Loran A. Circle
2840 Sferra Ave., NW
Warren, OH 44483

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, 43216-1049.

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.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO** **Eastgate Dev & Trans Study** **WV** **PA**

Synthetic Minor Determination and/or □ Netting Determination

Permit To Install: 02-22437

A. Source Description

Rally Time is a proposed start up company, locating in Warren, Ohio in Trumbull County. They will manufacture fiberglass motorcycle trailers.

B. Facility Emissions and Attainment Status

Rally Time plans to build fiberglass trailers using an open mold spray lay up process. This type of operation emits organic compounds, and the major constituent of fiberglass manufacturing is styrene.
Trumbull county is currently designated attainment for particulate, ozone, sulfur dioxide , and nitrogen oxides.

C. Source Emissions

Rally Time will manufacture the fiberglass portion of the trailers in one section of the building divided into three work areas. All three areas will be vented by a common exhaust system designed by Frees, Inc. The operation will be typical open mold fiberglass manufacturing, consisting of mold preparation, gel coat application, lay up with application of resin and fiberglass matting. The gel coat and resin have high volatile organic compound content and will emit organic compounds. One of the major constituents of the organic compounds (OC) emitted is styrene, which is a hazardous air pollutant (HAP).

Rally Time determined their potential to emit (PTE) at 31.45 tons per year (TPY) OC and 27.4 TPY of HAPs.
At this PTE, Rally Time would be a major facility for HAPs, and subject to the National Emissions Standards for Hazardous Pollutants : Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW.

Rally Time has elected to limit individual and total HAP emissions to below the major thresholds of 10 and 25 TPY, respectfully.

D. Conclusion

This permit will limit Rally Time to 21.9 TPY of OC emissions, and HAPs emissions to 9.0 TPY for individual HAP and 12.0 TPY for combined HAPs on a 12- month rolling basis. This will assure the facility remains below the threshold level for TV permitting, and will remain a minor source for HAPs emissions, and therefore be exempt from the MACT Subpart WWWW.

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 02-22437

Application Number: 02-22437

Facility ID: 0278080819

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

Name of Facility: Rally Time Trailers, Inc.

Person to Contact: Loran A. Circle

Address: 2840 Sferra Ave., NW
Warren, OH 44483

Location of proposed air contaminant source(s) [emissions unit(s)]:
2840 Sferra Ave., NW
Warren, Ohio

Description of proposed emissions unit(s):
Fiberglass Layup area.

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

Chris Korleski
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

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

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.

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(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

Pollutant	Tons Per Year
Organic Compounds (OC) emissions	21.9
Combined HAP emissions	12.0
Individual HAP emissions	9.0

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.

Operations, Property, and/or Equipment - (P001) - fiberglass layup work area no. 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation. Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup. See sections B.1 and B.2 below.
OAC rule 3745-21-07(G)(2)	Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.
OAC rule 3745-31-02(A)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emissions from emissions units P001, P002 and P003 shall not exceed:

i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and

ii. 12.0 tons/year of total combined HAPS,

based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total aggregate HAP (Tons)
1	3.0	4.0

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1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. Acetone shall be the only OC material employed for cleanup.

2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the lay up operation:

   a. the company identification for each photochemically reactive material employed;

   b. the number of pounds of each photochemically reactive material employed;

   c. the OC content of each photochemically reactive material, in percent by weight;

   d. the total OC emission rate for all photochemically reactive materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

   [Note: The definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

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2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:

   a. the name and identification of each resin, gel coat and catalyst material employed;

   b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;

   c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;

   d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;

   e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;

   f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;

   g. a summation of individual and total HAPs emissions, in pounds;

   h. the company identification for each clean up material employed;

   i. the amount of each cleanup material employed, in gallons;

   j. the OC content of each cleanup material employed, in pounds per gallon; and

   k. the total OC emission rate for all cleanup materials, i.e.,(i) x (j), in pounds.

3. The permit to install for this emissions unit P001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the “worst case” pollutant(s):

   Pollutant: styrene
   TLV (mg/m3): 85.0

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Maximum Hourly Emission Rate (lbs/hr): 5.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0
MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

   a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

   b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and

   c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.

4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPs emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs per hour of OC from the lay up coat operation

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.

   b. Emission Limitation:

      40 lbs per day of OC from the lay up coat operation

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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.

c. Emission Limitation:

7.3 ton per year of OC from the lay up coat operation

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

d. Emission Limitation:

9.0 tons per year of any individual HAP from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

e. Emission Limitation:

12.0 tons per year of total combined HAPs from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.

f. Emission Limitation:

1080 pounds per month of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.

g. Emission Limitation:

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6.5 tons per year of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.

F. Miscellaneous Requirements

None

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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.

Operations, Property, and/or Equipment - (P002) - fiberglass layup work area no. 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation. Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup. See sections B.1 and B.2 below.
OAC rule 3745-21-07(G)(2)	Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.
OAC rule 3745-31-02(A)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emissions from emissions units P001, P002 and P003 shall not exceed:

i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and

ii. 12.0 tons/year of total combined HAPS,

based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total aggregate HAP (Tons)
1	3.0	4.0

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1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. Acetone shall be the only OC material employed for cleanup.

2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the lay up operation:

   a. the company identification for each photochemically reactive material employed;

   b. the number of pounds of each photochemically reactive material employed;

   c. the OC content of each photochemically reactive material, in percent by weight;

   d. the total OC emission rate for all photochemically reactive materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

   [Note: The definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

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2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:

   a. the name and identification of each resin, gel coat and catalyst material employed;

   b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;

   c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;

   d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;

   e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;

   f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;

   g. a summation of individual and total HAPs emissions, in pounds;

   h. the company identification for each clean up material employed;

   i. the amount of each cleanup material employed, in gallons;

   j. the OC content of each cleanup material employed, in pounds per gallon; and

   k. the total OC emission rate for all cleanup materials, i.e.,(i) x (j), in pounds.

3. The permit to install for this emissions unit P001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the “worst case” pollutant(s):

   Pollutant: styrene
   TLV (mg/m3): 85.0

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Maximum Hourly Emission Rate (lbs/hr): 5.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0
MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

   a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

   b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and

   c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.

4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPs emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs per hour of OC from the lay up coat operation

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.

   b. Emission Limitation:

      40 lbs per day of OC from the lay up coat operation

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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.

c. Emission Limitation:

7.3 ton per year of OC from the lay up coat operation

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

d. Emission Limitation:

9.0 tons per year of any individual HAP from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

e. Emission Limitation:

12.0 tons per year of total combined HAPs from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.

f. Emission Limitation:

1080 pounds per month of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.

g. Emission Limitation:

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6.5 tons per year of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.

F. Miscellaneous Requirements

None

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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.

Operations, Property, and/or Equipment - (P003) - fiberglass layup work area no. 3

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation. Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup. See sections B.1 and B.2 below.
OAC rule 3745-21-07(G)(2)	Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.
OAC rule 3745-31-02(A)(2)	See section A.2.a below.

2. Additional Terms and Conditions

2.a The emissions from emissions units P001, P002 and P003 shall not exceed:

i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and

ii. 12.0 tons/year of total combined HAPS,

based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP (Tons)	Maximum Allowable Cumulative Emissions of total aggregate HAP (Tons)
1	3.0	4.0

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1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. Acetone shall be the only OC material employed for cleanup.

2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the lay up operation:

   a. the company identification for each photochemically reactive material employed;

   b. the number of pounds of each photochemically reactive material employed;

   c. the OC content of each photochemically reactive material, in percent by weight;

   d. the total OC emission rate for all photochemically reactive materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

   [Note: The definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

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2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:

   a. the name and identification of each resin, gel coat and catalyst material employed;

   b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;

   c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;

   d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;

   e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;

   f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;

   g. a summation of individual and total HAPs emissions, in pounds;

   h. the company identification for each clean up material employed;

   i. the amount of each cleanup material employed, in gallons;

   j. the OC content of each cleanup material employed, in pounds per gallon; and

   k. the total OC emission rate for all cleanup materials, i.e.,(i) x (j), in pounds.

3. The permit to install for this emissions unit P001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the “worst case” pollutant(s):

   Pollutant: styrene
   TLV (mg/m3): 85.0

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Maximum Hourly Emission Rate (lbs/hr): 5.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0
MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

   a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

   b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and

   c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.

4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPs emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs per hour of OC from the lay up coat operation

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.

   b. Emission Limitation:

      40 lbs per day of OC from the lay up coat operation

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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.

c. Emission Limitation:

7.3 ton per year of OC from the lay up coat operation

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

d. Emission Limitation:

9.0 tons per year of any individual HAP from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

e. Emission Limitation:

12.0 tons per year of total combined HAPs from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.

f. Emission Limitation:

1080 pounds per month of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.

g. Emission Limitation:

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6.5 tons per year of OC emissions from cleanup from emissions units P001, P002 and P003

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.

F. Miscellaneous Requirements

None

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SIC CODE 3715 SCC CODE 30101899 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION fiberglass layup work area no. 1

DATE INSTALLED 5/2007

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					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	40 lbs/day	3.0	40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics HAPs			single 7.0 total 7.8		single 9.0 total 12.0

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination compliance with synthetic minor terms

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

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Rally Time Trailers, Inc. **Facility ID: 0278080819**
PTI Application: 02-22437
Issued: To be entered upon final issuance

SIC CODE 3715 SCC CODE 30101899 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION fiberglass layup work area no. 2

DATE INSTALLED 5/2007

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					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	40 lbs/day	3.0	40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics HAPS			single 7.0 total 7.8		single 9.0 total 12.0

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination compliance with synthetic minor terms

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

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Rally Time Trailers, Inc. **Facility ID: 0278080819**
PTI Application: 02-22437
Issued: To be entered upon final issuance

SIC CODE 3715 SCC CODE 30101899 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION fiberglass layup work area no. 3

DATE INSTALLED 5/2007

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					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	40 lbs/day	3.0	40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics HAPs			single 7.0 total 7.8		single 9.0 total 12.0

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination compliance with synthetic minor terms

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

Rally Time Trailers, Inc. **Facility ID: 0278080819**

PTI Application: 02-22437

Issued: To be entered upon final issuance

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