

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

Permit To Install: **04-01457**

A. Source Description

This facility is adding six new pultrusion lines and a new mixer to its existing five pultrusion lines, two coating lines, and mixer. This facility is also increasing the allowable emissions for the current pultrusion lines and mixer. This will change the facility from a minor to major facility for organic HAPs. This increase in emissions will make it subject to MACT for the coating lines of 40 CFR Part 63 Subpart PPPP and for the mixers and pultrusion lines subject to 40 CFR Part 63 Subpart WWWW. Since the facility is going from an existing area source and becoming a major source of organic HAP, it has three years from the date this modification becomes final to comply with the MACT for the pultrusion lines and mixers. The facility is taking a voluntary restriction of 40.0 pounds per day on the pultrusion lines (P002-P006, P008-P013) to avoid a 85% reduction of photochemically reactive Volatile Organic Compound (VOC) emissions. The facility is also taking a voluntary restriction of 90 tons per year on VOC emissions to avoid NNSR.

B. Facility Emissions and Attainment Status

The existing facility is a minor source for all criteria air pollutants and is a minor source of VOC due to voluntary operational restrictions. After issuance of this PTI, it will become a major source of organic HAP.

<u>Pollutant</u>	<u>Significant Net Emission Increase Levels</u>	<u>Attainment Status</u>
PM _{2.5}	250 TPY	attainment
PM ₁₀	250 TPY	unclassifiable
SO ₂	250 TPY	attainment
VOC	100 TPY	non-attainment
NO _x	250 TPY	unclassifiable/attainment
CO	250 TPY	unclassifiable/attainment

C. Applicable Rules/Regulations

OAC rule 3745-31-05(A)(3)	BAT
OAC rule 3745-31-05(C)	operational restriction to restrict emissions below major size cutoff
OAC rule 3745-21-07(G)(2)	8 lbs/hr & 40 lbs/day unless 85% overall OC control due to photochemically reactive resin usage.
OAC rule 3745-17-07(A)(1)	VE shall not exceed 20% opacity as a 6-minute average
OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.55 pounds per hour
OAC rule 3745-21-11(B)	less stringent than BAT
ORC 3704.03(T)(4)	BAT not applicable for emission less than ten tons per year
40 CFR Part 63, Subpart PPPP	MACT for surface coating of plastic parts
40 CFR Part 63, Subpart WWWW	MACT for reinforced plastic composites
40 CFR Part 63, Subpart A	MACT general provisions

D. Source Emissions

Comfort Line is requesting a facility-wide, federally enforceable, operational restriction on VOC emissions of 90.0 tons per year.

P001, P007 Resin Blending Mixers 1 & 2

Mix Rate (lbs/hr) = 1,000
 Styrene Content (% by weight) = 37.5%
 Dry Solids Content (% by weight) = 62.50%
 Emission Factor (styrene) = 0.010 lbs styrene/lb paste **(supplied by applicant)**
 Emission Factor (styrene) = 0.0044 lbs styrene/lb paste **(with MACT compliant cover)**
 $1 - (0.0044/0.010) = 56\%$ control
 OC (Styrene) emitted (lbs/hr) = 3.75 **(1.65 lb/hr with MACT compliant cover)**
 OC (Styrene) emitted (lbs/day) = 90.0 **(39.6 lb/day with MACT compliant cover)**
 OC (Styrene) emitted (tons/year) = 16.4 **(7.23 tons/yr with MACT compliant cover)**
 Emission Factor (PM) = 0.010 lb/lb
 Uncontrolled PM (lbs/hr) = 6.25
 Uncontrolled PM (tons/yr) = 27.38

Controlled PM (99% control) (lbs/hr) = 0.06
 Controlled PM (tons/year) = 0.26

The emission factor for styrene of 0.010 lbs styrene/lb paste is based on AP-42 for paint mixing (1-2% of coating). Because styrene has a lower vapor pressure than paint solvents, the lower end of the range of AP-42 for paint mixing is used. The new emission factor of 0.0044 for styrene reflects implementation of MACT-compliant covers and operating restrictions. The number chosen by the permittee is based on test-derived emission factors from MACT-compliant paste mixers at Venture Industries in Conneaut, OH.

Per the White Paper on Amendment of OAC rule 3745-21-07, it is Ohio EPA's position that "mixing" is not considered "employing" as it relates to employing any photochemically reactive material or substance containing such photochemically reactive material in OAC rule 3745-21-07(G)(2) based upon the Ohio Supreme Court case of Ashland Chem. Co. v. Jones, 92 Ohio St.3d 234, 2001-Ohio-184. Therefore, Resin Blending Mixers 1 & 2 (P001,P007) are not subject to OAC rule 3745-21-07(G)(2).

OC=VOC=Organic HAP (styrene) = (2 mixers) * (1,000 lb of paste/hr) * (37.5% by weight of styrene) * (0.0044 lbs styrene/lb paste EF) * (8760 hrs/yr) / (2000 lbs/ton) = 14.45 tons of HAP/yr

All OC emissions from mixing are HAP (ie. styrene)

P002-P006, P008-P013 Pultrusion Lines

	Pultrusion Line A (P002)	Pultrusion Line B (P003)	Pultrusion Line C (P004)	Pultrusion Lines D-K each (P005,P006 P008-P013)	Pultrusion Line D-K total (P005,P006 P008-P013)	Total
Pounds Paste per Linear Foot of Product	0.46	0.46	0.90	0.50		
Linear Foot Product per min	6.0	6.0	6.0	8.0		
Paste Pultruded (lbs/hr)	165.60	165.60	324.00	240.00	1920.00	
Styrene Monomer Pultruded (lbs/hr)	62.10	62.10	121.50	90.00	720.00	
OC Emission Factor (styrene) (lb/lb)	0.04	0.04	0.04	0.04	0.04	
OC emitted (lbs/hr)	2.48	2.48	4.86	3.60	28.80	38.62
OC emitted (lbs/day)	40.0 ^b	40.0 ^b	40.0 ^b	40.0 ^b	320.0	440.0
OC emitted (tons/yr)	7.3	7.3	7.3	7.3	58.4	80.3 ^a
saw cuts (cuts/min)	0.500	0.500	0.500	0.667		
PM - saw cut (lbs/cut)	0.012	0.012	0.012	0.012		
Uncontrolled PM (lbs/hr)	0.35	0.35	0.35	0.47	3.76	4.81
Uncontrolled PM (ton/yr)	1.53	1.53	1.53	2.06	16.48	21.07
Controlled PM with 99% control (lbs/hr)	0.0035	0.0035	0.0035	0.0047	0.0376	0.0481

/a/ Permittee has taken an operational restriction of 90.0 tons per year of VOC facility-wide
 /b/ Permittee has taken an operational restriction of 40.0 pounds per day of photochemically reactive VOC on the pultrusion lines to avoid 85% control per OAC 3745-21-07(G)(2).

Terms defined:

Pounds paste per linear foot of product:: maximum profile weight per linear foot as provided by permittee
Linear foot of product per minute: maximum pultrusion speed of line per hour as provided by permittee
Paste pultruded (lbs/hr): (pounds paster per linear foot of product) * (linear foot of product per minute) * (60 min/hr)
Styrene monomer pultruded (lbs/hr): (paste pultruded) * (styrene content of paste)
styrene content of paste (percent by weight): reported by permittee as 37.5% maximum
OC Emission Factor (lb styrene emitted/lb styrene in paste processed): ((0.157) * (styrene content of paste)) - 0.165
 per 40 CFR Part 63 Subpart WWWW Table 1 equation 1.c.i.
OC emitted (lbs/hr): (styrene monomer pultruded) * (OC emissions factor)
OC emitted (lbs/day): (styrene emitted (lbs/hr)) * (24 hrs/day); a federally enforceable voluntary restriction of 40 pounds per day
OC emitted (tons/yr): (styrene emitted (lbs/hr)) * (8760 hrs/yr) / (2000 lbs/ton); restriction of 7.3 tons per year due to federally enforceable restriction of 40.0 pounds per day; (40 lbs/day) * (365 days/yr) / (2000 lbs/ton) = 7.3 tons/yr
saw cuts (cuts/min): (linear foot of product per minute) / (12 foot part length)
12 foot part length: provided by permittee
PM-saw cut (lbs/cut): (density of pultruded part (lbs/ft3)) * (volume of cut (ft3/cut))
density of pultruded part (lbs/ft3): provided by permittee
volume of cut (ft3/cut): provided by permittee as defined by saw blade width and profile area of part
Uncontrolled PM (lbs/hr): (PM-saw cut (lbs/cut)) * (saw cuts (cuts/min)) * (60 min/hr)
Uncontrolled PM (ton/yr): (Uncontrolled PM (lbs/hr)) * (8760 hrs/yr) / (2000 lbs/ton)
Controlled PM with 99% control (lbs/hr): (Uncontrolled PM (lbs/hr)) * (1-control)
Control: fabric filter system

Notes:

1. Permittee has taken an operational restriction of 90 tons per year of OC, facility wide.
2. Permittee has taken a restriction of 40.0 pounds per day of photochemically reactive VOC emissions on pultrusion lines to avoid 85% control of photochemically reactive material per OAC 3745-21-07(G)(2).
3. Cleanup materials are a total of 2.18 ton/month and 26.14 ton/year for the mixing and pultrusion lines.
4. PM is below 10 tons per year, uncontrolled, for all pultrusion lines. Therefore, per SB256, BAT does not apply.
5. Permittee will have to comply with MACT (40 CFR Part 63, Subpart WWWW) for pultrusion lines within three years of becoming major source of HAP (ie. finalization of this PTI).
6. All OC emissions from pultrusion, excluding cleanup, are HAP (ie styrene).

K001-K002 Coating Line

	K001-Base Coat	K002-Top Coat	Total
OC (lbs/gal)	5.0	6.0	
Solids (lbs/gal)	9.0	10.0	
Coating Used (gal/hr)	1.20	0.24	
OC emissions from coating (lbs/hr)	6.0	1.44	7.44
HAP emissions from coating (lbs/hr)	1.73	0.38	2.11

OC emissions from coating (tons/year)	26.28	6.31	32.59
HAP emissions from coating (tons/yr)	7.57	1.68	9.25
OC emissions from cleanup (lb/month)	104.9	46.5	151.40
OC emissions cleanup (tons/year)	0.63	0.28	0.91
Total OC emissions (coating and cleanup in tons/year)	26.91	6.59	33.50
PM in 40% OS (lbs/hr) - uncontrolled	4.32	0.96	5.28
Uncontrolled PM (tons/yr)	18.92	4.20	23.12
PM emissions with 99% control (lbs/hr)	0.043	0.010	0.053
PM emissions with 99% control (tons/year)	0.19	0.04	0.23

Terms defined:

OC (lbs/gal): information provided by manufacturer

Solids (lbs/gal): information provided by manufacturer

Coating Used (gal/hr): information provided by permittee

OC emissions from coating (lbs/hr): $(OC \text{ (lbs/gal)}) * (\text{Coating Used (gal/hr)})$, all OC assumed to evaporate

HAP emissions from coating (lbs/hr): $(\text{Coating Used (gal/hr)}) * (\text{Solids (lbs/gal)}) * (0.16 \text{ lb HAP/lb Solids})$

OC emissions from coating (tons/yr): $(OC \text{ emissions from coating (lbs/hr)}) * (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$

HAP emissions from coating (tons/yr): $(\text{HAP emissions from coating (lbs/hr)}) * (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$

OC emissions from cleanup (lb/month): provided by permittee, based on past performance and anticipation for future

OC emissions from cleanup (tons/yr): $(OC \text{ emissions from cleanup (lb/month)}) * (12 \text{ months/yr})$

PM in 40% OS (lbs/hr): $(\text{Coating Used (gal/hr)}) * (\text{Solids (lbs/gal)}) * (0.40 \text{ Overspray (OS)})$

Uncontrolled PM (tons/yr): $(\text{PM in 40\% OS (lbs/hr)}) * (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$

PM emissions with 99% control (lbs/hr): $(\text{PM in 40\% OS (lbs/hr)}) * (1.0 - 99\% \text{ control})$; particulate filter for control

PM emissions with 99% control (tons/yr): $(\text{PM emissions with 99\% control (lbs/hr)}) * (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$

Notes:

1. K001 (Base coating) contains no photochemically reactive materials, therefore not subject to OAC rule 3745-21-07(G)(2) per OAC rule 3745-21-07(G)(9)(f).
2. K001 has less than 10 tons per year of PM, controlled, therefore not subject to BAT with voluntary fabric filter control.
3. K002 (Top coat) has less than 10 tons per year of OC and PM, uncontrolled, and is therefore not subject

- to BAT, per SB256 for either OC or PM.
- 4. Permittee has taken the option of MACT compliant coatings, maximum of 0.16 lb HAP/lb solids applied.
- 5. Cleanup materials will be non-HAP, non-photochemically reactive materials (ie. acetone).
- 6. Reducing solvents will be non-HAP material.

E. Air Toxics

According to 40 CFR 63, a major source is defined in section 112(a) of the Clean Air Act as amended in 1990 (Act) as a source that emits, or has the potential to emit, considering controls, 10 tons per year (tpy) or more of any individual HAP or 25 tpy or more of any combination of HAP. This source is considered a major source for HAPS. Since the MACT control requirements do not go into effect for three years for 40 CFR Part 63, Subpart WWWW, this PTI is subject to the Air Toxics Policy until the MACT is applicable.

01/30/06
13:49:36

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Comfort Line emission unit - styrene emissions

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.00000
STACK HEIGHT (M) = 12.1900
STK INSIDE DIAM (M) = .3440
STK EXIT VELOCITY (M/S)= 50.7793
STK GAS EXIT TEMP (K) = 299.8000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = URBAN
BUILDING HEIGHT (M) = 9.1400
MIN HORIZ BLDG DIM (M) = 134.1000
MAX HORIZ BLDG DIM (M) = 164.6000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 10000.000 (ACFM)

BUOY. FLUX = .334 M**4/S**3; MOM. FLUX = 74.553 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	U10M STAB	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	SIGMA DWASH
1.	.2040E-14	6	1.0	1.1	10000.0	31.25	3.33	3.33 NO
100.	164.1	4	4.0	4.2	1280.0	16.98	15.69	13.79 SS
200.	105.6	6	1.0	1.1	10000.0	31.25	21.86	15.05 NO
300.	146.1	6	1.0	1.1	10000.0	31.25	31.65	20.66 NO
400.	135.6	6	1.0	1.1	10000.0	31.25	41.21	25.88 NO
500.	115.2	6	1.0	1.1	10000.0	31.25	50.50	30.72 NO
600.	96.50	6	1.0	1.1	10000.0	31.25	59.52	35.25 NO
700.	81.34	6	1.0	1.1	10000.0	31.25	68.28	39.49 NO
800.	69.38	6	1.0	1.1	10000.0	31.25	76.79	43.49 NO
900.	59.94	6	1.0	1.1	10000.0	31.25	85.07	47.28 NO
1000.	52.41	6	1.0	1.1	10000.0	31.25	93.13	50.89 NO

1100.	46.33	6	1.0	1.1	10000.0	31.25	100.98	54.33	NO
1200.	41.36	6	1.0	1.1	10000.0	31.25	108.64	57.63	NO
1300.	37.23	6	1.0	1.1	10000.0	31.25	116.12	60.80	NO
1400.	33.77	6	1.0	1.1	10000.0	31.25	123.42	63.84	NO
1500.	30.83	6	1.0	1.1	10000.0	31.25	130.56	66.79	NO
1600.	28.32	6	1.0	1.1	10000.0	31.25	137.54	69.63	NO
1700.	26.15	6	1.0	1.1	10000.0	31.25	144.38	72.39	NO
1800.	24.26	6	1.0	1.1	10000.0	31.25	151.07	75.06	NO
1900.	22.60	6	1.0	1.1	10000.0	31.25	157.63	77.66	NO
2000.	21.13	6	1.0	1.1	10000.0	31.25	164.07	80.19	NO
2100.	19.83	6	1.0	1.1	10000.0	31.25	170.38	82.65	NO
2200.	18.67	6	1.0	1.1	10000.0	31.25	176.58	85.05	NO
2300.	17.63	6	1.0	1.1	10000.0	31.25	182.67	87.39	NO
2400.	16.68	6	1.0	1.1	10000.0	31.25	188.65	89.69	NO
2500.	15.83	6	1.0	1.1	10000.0	31.25	194.53	91.93	NO
2600.	15.06	6	1.0	1.1	10000.0	31.25	200.31	94.12	NO
2700.	14.35	6	1.0	1.1	10000.0	31.25	206.00	96.27	NO
2800.	13.70	6	1.0	1.1	10000.0	31.25	211.61	98.38	NO
2900.	13.10	6	1.0	1.1	10000.0	31.25	217.12	100.45	NO
3000.	12.55	6	1.0	1.1	10000.0	31.25	222.55	102.48	NO
3500.	10.35	6	1.0	1.1	10000.0	31.25	248.58	112.13	NO
4000.	8.780	6	1.0	1.1	10000.0	31.25	272.93	121.07	NO
4500.	7.608	6	1.0	1.1	10000.0	31.25	295.87	129.43	NO
5000.	6.703	6	1.0	1.1	10000.0	31.25	317.59	137.31	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
54. 221.4 3 4.0 4.2 1280.0 15.28 11.97 11.00 SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 9.14	CAVITY HT (M) = 9.14
CAVITY LENGTH (M) = 52.35	CAVITY LENGTH (M) = 50.27
ALONGWIND DIM (M) = 134.10	ALONGWIND DIM (M) = 164.60

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

END OF CAVITY CALCULATIONS

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION	MAX CONC	DIST TO TERRAIN
PROCEDURE	(UG/M**3)	MAX (M) HT (M)

SIMPLE TERRAIN 221.4 54. 0.

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

TWA for styrene monomer = 20 ppm

TLV in mg/m3 = (TLV in ppm)(MW)/24.45 = 20(104.16)/24.45 = 85 mg/m3 = 85,000 ug/m3

MAGLC = TLV/42 = 85,000/42 = 2028.6 ug/m3

Screen3 modeling run with limit of 8.0 lbs/hr per emission unit. This was adjusted for a total PTE of all styrene emission units. PTE of Mixing and Pultrusion lines = 7.50 lbs/hr + 38.62 lbs/hr = 46.12 lbs /hr

Maximum modeling concentration = 221.4 ug/m3 (x 46.12/8.0) = 1,276.4 ug/m3

Model summed over two mixers and eleven pultrusion lines which each have PTE of less than 8.0 lbs/hour of styrene emissions. The combined effect of these sources are less than MAGLC, so passes modeling.

02/14/06
10:25:49

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Comfort Line K001 - Main Coating Line (stack 1)

SIMPLE TERRAIN INPUTS:
SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.00000
STACK HEIGHT (M) = 10.7000
STK INSIDE DIAM (M) = .6100
STK EXIT VELOCITY (M/S)= 4.8447
STK GAS EXIT TEMP (K) = 299.8000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = URBAN
BUILDING HEIGHT (M) = 9.1400
MIN HORIZ BLDG DIM (M) = 134.1000
MAX HORIZ BLDG DIM (M) = 164.6000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 3000.0000 (ACFM)

BUOY. FLUX = .100 M**4/S**3; MOM. FLUX = 2.134 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	U10M STAB	USTK (M/S)	MIX (M/S)	HT (M)	PLUME Y (M)	SIGMA Z (M)	SIGMA DWASH
1.	.0000	0	.0	.0	.0	.00	.00	NA
100.	.939.0	4	1.0	1.0	320.0	12.82	15.69	13.79 SS

200.	586.7	6	1.0	1.0	10000.0	15.14	21.17	14.03	SS
300.	376.1	6	1.0	1.0	10000.0	15.14	31.18	19.93	SS
400.	252.3	6	1.0	1.0	10000.0	15.14	40.85	25.30	SS
500.	181.3	6	1.0	1.0	10000.0	15.14	50.21	30.24	SS
600.	137.5	6	1.0	1.0	10000.0	15.14	59.27	34.82	SS
700.	108.7	6	1.0	1.0	10000.0	15.14	68.06	39.11	SS
800.	88.74	6	1.0	1.0	10000.0	15.14	76.59	43.15	SS
900.	74.27	6	1.0	1.0	10000.0	15.14	84.89	46.97	SS
1000.	63.41	6	1.0	1.0	10000.0	15.14	92.97	50.60	SS
1100.	55.02	6	1.0	1.0	10000.0	15.14	100.83	54.06	SS
1200.	48.39	6	1.0	1.0	10000.0	15.14	108.50	57.37	SS
1300.	43.05	6	1.0	1.0	10000.0	15.14	115.99	60.55	SS
1400.	38.66	6	1.0	1.0	10000.0	15.14	123.30	63.61	SS
1500.	35.01	6	1.0	1.0	10000.0	15.14	130.44	66.56	SS
1600.	31.93	6	1.0	1.0	10000.0	15.14	137.43	69.42	SS
1700.	29.30	6	1.0	1.0	10000.0	15.14	144.27	72.18	SS
1800.	27.04	6	1.0	1.0	10000.0	15.14	150.97	74.86	SS
1900.	25.07	6	1.0	1.0	10000.0	15.14	157.54	77.47	SS
2000.	23.36	6	1.0	1.0	10000.0	15.14	163.98	80.00	SS
2100.	21.84	6	1.0	1.0	10000.0	15.14	170.30	82.47	SS
2200.	20.49	6	1.0	1.0	10000.0	15.14	176.50	84.87	SS
2300.	19.29	6	1.0	1.0	10000.0	15.14	182.59	87.22	SS
2400.	18.21	6	1.0	1.0	10000.0	15.14	188.57	89.52	SS
2500.	17.24	6	1.0	1.0	10000.0	15.14	194.45	91.77	SS
2600.	16.36	6	1.0	1.0	10000.0	15.14	200.24	93.96	SS
2700.	15.56	6	1.0	1.0	10000.0	15.14	205.93	96.12	SS
2800.	14.83	6	1.0	1.0	10000.0	15.14	211.54	98.23	SS
2900.	14.16	6	1.0	1.0	10000.0	15.14	217.05	100.30	SS
3000.	13.55	6	1.0	1.0	10000.0	15.14	222.49	102.34	SS
3500.	11.10	6	1.0	1.0	10000.0	15.14	248.52	112.00	SS
4000.	9.377	6	1.0	1.0	10000.0	15.14	272.88	120.95	SS
4500.	8.098	6	1.0	1.0	10000.0	15.14	295.82	129.32	SS
5000.	7.116	6	1.0	1.0	10000.0	15.14	317.54	137.20	SS

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
42. 1498. 3 1.0 1.0 320.0 11.89 9.38 8.60 SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 9.14	CAVITY HT (M) = 9.14
CAVITY LENGTH (M) = 52.35	CAVITY LENGTH (M) = 50.27
ALONGWIND DIM (M) = 134.10	ALONGWIND DIM (M) = 164.60

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

END OF CAVITY CALCULATIONS

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
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SIMPLE TERRAIN	1498.	42.	0.
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** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

02/14/06
11:02:09

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Comfort Line K001 Main Coating Line (stack 2)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.00000
STACK HEIGHT (M) = 10.7000
STK INSIDE DIAM (M) = .8600
STK EXIT VELOCITY (M/S)= .9750
STK GAS EXIT TEMP (K) = 299.8000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = URBAN
BUILDING HEIGHT (M) = 9.1400
MIN HORIZ BLDG DIM (M) = 134.1000
MAX HORIZ BLDG DIM (M) = 164.6000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 1200.0000 (ACFM)

BUOY. FLUX = .040 M**4/S**3; MOM. FLUX = .172 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	U10M STAB	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	SIGMA DWASH
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1.	.0000	0	.0	.0	.0	.00	.00	NA
100.	1416.	6	1.0	1.0	10000.0	11.80	10.79	9.62 SS
200.	702.2	6	1.0	1.0	10000.0	11.80	21.17	15.96 SS
300.	397.8	6	1.0	1.0	10000.0	11.80	31.18	21.68 SS
400.	257.7	6	1.0	1.0	10000.0	11.80	40.85	26.90 SS
500.	182.7	6	1.0	1.0	10000.0	11.80	50.21	31.72 SS
600.	137.8	6	1.0	1.0	10000.0	11.80	59.27	36.21 SS
700.	108.7	6	1.0	1.0	10000.0	11.80	68.06	40.42 SS

800.	88.57	6	1.0	1.0	10000.0	11.80	76.59	44.38	SS
900.	74.07	6	1.0	1.0	10000.0	11.80	84.89	48.14	SS
1000.	63.22	6	1.0	1.0	10000.0	11.80	92.97	51.71	SS
1100.	54.85	6	1.0	1.0	10000.0	11.80	100.83	55.12	SS
1200.	48.24	6	1.0	1.0	10000.0	11.80	108.50	58.39	SS
1300.	42.91	6	1.0	1.0	10000.0	11.80	115.99	61.53	SS
1400.	38.54	6	1.0	1.0	10000.0	11.80	123.30	64.56	SS
1500.	34.90	6	1.0	1.0	10000.0	11.80	130.44	67.48	SS
1600.	31.83	6	1.0	1.0	10000.0	11.80	137.43	70.30	SS
1700.	29.22	6	1.0	1.0	10000.0	11.80	144.27	73.04	SS
1800.	26.96	6	1.0	1.0	10000.0	11.80	150.97	75.69	SS
1900.	25.01	6	1.0	1.0	10000.0	11.80	157.54	78.28	SS
2000.	23.30	6	1.0	1.0	10000.0	11.80	163.98	80.79	SS
2100.	21.78	6	1.0	1.0	10000.0	11.80	170.30	83.24	SS
2200.	20.44	6	1.0	1.0	10000.0	11.80	176.50	85.62	SS
2300.	19.25	6	1.0	1.0	10000.0	11.80	182.59	87.96	SS
2400.	18.17	6	1.0	1.0	10000.0	11.80	188.57	90.24	SS
2500.	17.21	6	1.0	1.0	10000.0	11.80	194.45	92.47	SS
2600.	16.33	6	1.0	1.0	10000.0	11.80	200.24	94.65	SS
2700.	15.53	6	1.0	1.0	10000.0	11.80	205.93	96.79	SS
2800.	14.80	6	1.0	1.0	10000.0	11.80	211.54	98.89	SS
2900.	14.14	6	1.0	1.0	10000.0	11.80	217.05	100.95	SS
3000.	13.53	6	1.0	1.0	10000.0	11.80	222.49	102.97	SS
3500.	11.09	6	1.0	1.0	10000.0	11.80	248.52	112.59	SS
4000.	9.364	6	1.0	1.0	10000.0	11.80	272.88	121.49	SS
4500.	8.088	6	1.0	1.0	10000.0	11.80	295.82	129.83	SS
5000.	7.108	6	1.0	1.0	10000.0	11.80	317.54	137.68	SS

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
28. 2276. 6 1.0 1.0 10000.0 10.98 3.17 5.36 SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** REGULATORY (Default) ***
PERFORMING CAVITY CALCULATIONS
WITH ORIGINAL SCREEN CAVITY MODEL
(BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = 302.3	CONC (UG/M**3) = 371.0
CRIT WS @10M (M/S) = 2.89	CRIT WS @10M (M/S) = 2.89
CRIT WS @ HS (M/S) = 2.93	CRIT WS @ HS (M/S) = 2.93
DILUTION WS (M/S) = 1.47	DILUTION WS (M/S) = 1.47
CAVITY HT (M) = 9.14	CAVITY HT (M) = 9.14
CAVITY LENGTH (M) = 52.35	CAVITY LENGTH (M) = 50.27
ALONGWIND DIM (M) = 134.10	ALONGWIND DIM (M) = 164.60

END OF CAVITY CALCULATIONS

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION MAX CONC DIST TO TERRAIN

PROCEDURE	(UG/M**3)	MAX (M)	HT (M)
SIMPLE TERRAIN	2276.	28.	0.
BLDG. CAVITY-1	302.3	52.	-- (DIST = CAVITY LENGTH)
BLDG. CAVITY-2	371.0	50.	-- (DIST = CAVITY LENGTH)

**** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS ****

Stack 1

Maximum modeled concentration at **1 g/s** = 1498 ug/m³

Pollutant = methyl amyl ketone (MAK)

MAK is contained in white coating and is used as a cleanup solvent

Maximum coating usage = 1.2 gal/hr

MAK content of coating = 0.335 gal/gal coating

MAK density = 6.76 lb/gal

MAK coating emissions = 1.2 gal/hr x 0.335 gal/gal x 6.76 lb/gal = 2.72 lb/hr = 0.34 g/s

Maximum cleanup solvent usage (MAK) = 104.87 lb/month = 0.14 lb/hr = 0.02 g/s

Maximum MAK usage for line = 0.36 g/s

Maximum modeled concentration at **0.36 g/s** = 1498 ug/m³ x 0.36/1 = 539.3 ug/m³

Stack 2

Maximum modeled concentration at **1 g/s** = 1498 ug/m³

Pollutant = methyl amyl ketone (MAK)

MAK is contained in white coating and is used as a cleanup solvent

Maximum coating usage = 0.24 gal/hr

MAK content of coating = 0.254 gal/gal coating

MAK density = 6.76 lb/gal

MAK coating emissions = 0.24 gal/hr x 0.254 gal/gal x 6.76 lb/gal = 0.41 lb/hr = 0.05 g/s

Maximum cleanup solvent usage (MAK) = 46.51 lb/month = 0.06 lb/hr = 0.008 g/s

Maximum MAK usage for line = 0.058 g/s

Maximum modeled concentration at **0.058 g/s** = 1498 ug/m³ x 0.058/1 = 86.9 ug/m³

Maximum modeled concentration for Stack 1 + Stack 2 = 539.3 + 86.9 = 626.2 ug/m³

TWA for MAK = 50 ppm

MW MAK = 114.18 g/mole

TLV (ppm) = TLV(mg/m³) x 24.45/MW

TLV mg/m³ = 50(114.18)/24.45 = 233.50 mg/m³ = 233,500 ug/m³

Maximum allowable ground level concentration (MAGLC) = TLV/42

MAGLC = 233,500/42 = 5,560 ug/m³

Maximum Modeled concentration (626.2ug/m³ < MAGLC (5,560 ug/m³), so modeling passes.

F. PTI Emissions Summary

	<u>PE</u>	<u>OC(includes VOC)</u>	<u>HAP</u>
K001	0.19	26.91	7.57
K002	0.04	6.59	1.68
P001	0.22	16.4	16.4
P002	0.015	7.3	7.3
P003	0.015	7.3	7.3
P004	0.015	7.3	7.3
P005	0.021	7.3	7.3
P006	0.021	7.3	7.3
P007	0.22	16.4	16.4
P008	0.021	7.3	7.3
P009	0.021	7.3	7.3
P010	0.021	7.3	7.3
P011	0.021	7.3	7.3
P012	0.021	7.3	7.3
P013	0.021	7.3	7.3
Facility cleanup(mixers/pultrusion)		26.14 (non-VOC)	0
PTI Total	0.88	156.34	122.35

Facility-wide VOC emissions have a federally enforceable restriction of 90 tons per year.



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

LUCAS COUNTY

Application No: 04-01457

Fac ID: 0448011664

CERTIFIED MAIL

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

DATE: 10/24/2006

Comfort Line Ltd
Robert Spanns
5500 Enterprise Blvd
Toledo, OH 43612

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3000** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01457** FOR AN AIR CONTAMINANT SOURCE FOR
Comfort Line Ltd

On 10/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Comfort Line Ltd**, located at **5500 Enterprise Blvd, Toledo, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01457:

Modification of PTI 04-01436 to increase allowable emissions from current mixing and pultrusion lines and add six additional pultrusion lines.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604
[(419)936-3015]



STATE OF OHIO ENVIRONMENTAL PROTECTION
AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 04-01457

Application Number: 04-01457

Facility ID: 0448011664

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

Name of Facility: Comfort Line Ltd

Person to Contact: Robert Spanns

Address: 5500 Enterprise Blvd
Toledo, OH 43612

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

**5500 Enterprise Blvd
Toledo, Ohio**

Description of proposed emissions unit(s):

Modification of PTI 04-01436 to increase allowable emissions from current mixing and pultrusion lines and add six additional pultrusion lines.

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification
- 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, 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 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

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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 ninety (90) 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 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 (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. 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. 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., postmarked), 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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.88
OC	116.14
VOC	90.00
HAP	90.00

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

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:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	7.5
1-2	15.0
1-3	22.5
1-4	30.0
1-5	37.5
1-6	45.0
1-7	52.5
1-8	60.0
1-9	67.5
1-10	75.0
1-11	82.5
1-12	90.0

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

2. The permittee shall maintain monthly records of the following information:
 - a. During the first 12 calendar months of operation following the issuance of this permit, the cumulative VOC emissions, calculated by adding the current month's VOC emissions from all emissions units in the facility to the VOC emissions from each calendar month since the issuance of this permit from all emissions units in the facility; and

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC 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. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

None

Comfort Line Ltd**PTI Application: 04-01457****Issued: To be entered upon final issuance****Facility ID: 0448011664**

Emissions Unit ID: K001

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 - (K001) - Modification of Coating Line for fiberglass reinforced pultruded styrene resin to add MACT applicability.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic compound (VOC) emissions from coatings employed shall not exceed 6.0 pounds per hour and 26.28 tons per year.</p> <p>VOC emissions from line cleanup shall not exceed 104.9 pounds per month and 0.63 ton per year.</p>
ORC 3704.03(T)(4)	See section III.A.I.2.b.
OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(1)	Particulate Emissions (PE) shall not exceed 0.55 pound per hour.
OAC rule 3745-21-07(G)(9)(f)	Exemption from OAC rule 3745-21-07(G)(2) emissions limitations due to usage of non-photochemically reactive materials. See section III.A.II.2.
40 CFR Part 63 Subpart PPPP	<p>Organic HAP emissions shall not exceed 0.16 pounds of organic HAP emissions per pound of coating solids for any coating material used during each 12-month compliance period.</p> <p>See section III.A.II.3. and section III.A.I.2.c.</p>
40 CFR Part 63 Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

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

- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.55 pounds per hour particulate emissions under OAC rule 3745-17-11(B)(1).
- 2.c** The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart PPPP.
- 2.d** Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

II. Operational Restrictions

- 1. The permittee shall operate the paint booth fabric filter system whenever this emissions unit is in operation.
- 2. Coatings, reduction solvents and/or cleanup solvents that are Photochemically Reactive Materials as defined in OAC rule 3745-21-01(C)(5) shall not be used in this emission unit.
- 3. Cleanup solvent and reduction solvent shall not contain HAP.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for the coating operation:
 - a. the company identification for each coating and reduction solvent, including verification that the coating as applied is not a photochemically reactive material and the reduction solvent is not a photochemically reactive material and contains no HAP;
 - b. the number of gallons of each coating employed for each day, as applied;
 - c. the VOC content of each coating employed, in pounds per gallon as applied;
 - d. the total VOC emissions rate for all coating as applied, in pounds per day;
 - e. the total number of hours the emission unit was in operation each day;
 - f. the individual HAP and total HAP content of each coating in pounds per gallon of coating and pounds per pound of coating solids as applied;
 - g. for each month, the following information on cleanup solvent:
 - i. the company identification for each cleanup material used;

- ii. the identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;
 - iii. the gallons of cleanup material used per month;
 - iv. the pounds of VOC per gallon of cleanup material;
 - v. the gallons of spent cleanup material recovered for disposal;
 - vi. the pounds of VOC per gallon of spent cleanup material; and
 - vii. the pounds per month of VOC emissions from cleanup; and
 - h. for each year, the tons of VOC emitted from coatings and cleanup.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. any day during which a photochemically reactive material was employed and the OC emissions for each such day;
 - b. any day in which a HAP-containing reduction solvent or cleanup material was employed and the individual HAP emissions for each such day;
 - c. any day during which a coating was employed that exceeded the limitation of 0.16 pounds of HAP per pound of coating solids and the pounds of HAP per pound of coating solids for each such coating;
 - d. any exceedance of VOC emission limits for coating or cleanup, and the amount of such exceedance; and,
 - e. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

a. Emission Limitation:
6.0 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions by the number of actual hours that the emissions unit was in operation that day as recorded in Section III.A.III.1.d and III.A.III.1.e.

b. Emission Limitation:
26.28 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

The annual emissions limitation was based on the hourly limit (6.0 pounds per hour) multiplied by 8760 hours per year and divided by 2000 pounds per ton. Therefore, compliance with the hourly emission limitation serves as demonstration of compliance for the annual emission limitation.

c. Emission Limitation:
104.9 pounds of OC per month from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in Section III.A.III.1.g. Compliance shall be determined based upon the following equation:

$E_s = V_s * C_s - V_w * C_w$, where:

E_s = The pounds of VOC emissions from cleanup per month.

V_s = The gallons of cleanup solvent used per month.

C_s = The pounds of VOC per gallon of cleanup solvent.

V_w = The gallons of spent cleanup solvent recovered for waste disposal.

C_w = The pounds of VOC per gallon of spent cleanup solvent.

d. Emission Limitation:
0.63 tons of VOC per year from cleanup materials.

Applicable Compliance Method:

The annual emissions limitation was based on the monthly limit (104.9 pounds VOC per month) multiplied by 12 months per year and divided by 2000 pounds per ton. Therefore, compliance with the monthly emission limitation serves as demonstration of compliance for the annual emission limitation.

e. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

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Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: K001

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- f. Emission Limitation:
0.55 pounds of PE per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55);
and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

- g. Emission Limitation:
0.16 pounds of HAP per pound of coatings solids

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in Section III.A.III.1. The total HAP emissions per gallon of coating, as applied, as recorded in III.A.III.1.f shall be divided by the pounds of solid per gallon of coating as recorded in III.A.III.1.f, as applied.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emission unit K001 shall supercede all requirements for emission unit K001 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (K001) - Modification of Coating Line for fiberglass reinforced pultruded styrene resin to add MACT applicability.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section III.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 [K001] 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: methyl amyl ketone (MAK)
 TLV (mg/m3): 233.50
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 626.2
 MAGLC (ug/m3): 5,560

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: K001

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 - (K002) - Modification of Coating Line for fiberglass reinforced pultruded styrene resin to add MACT applicability.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(A)(1)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(1)	Particulate Emissions (PE) shall not exceed 0.55 pounds per hour.
ORC 3704.03(T)(4)	See Section III.A.I.2.a.
40 CFR Part 63, Subpart A	See section III.A.I.2.c.
40 CFR Part 63, Subpart PPPP	Organic HAP emissions shall not exceed 0.16 pound of organic HAP emissions per pound of coating solids for any coating material used during each 12-month compliance period. See section III.A.I.2.b and section III.A.II.3.
OAC 3745-21-07(G)(2)	Organic Compound (OC) emissions shall not exceed 8.0 pounds per hour and 40.0 pounds per day. See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) does not apply to the uncontrolled particulate and OC emissions from this air contaminant source since the potential to emit for particulate and OC emissions is less than ten tons per year.
- 2.b The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart PPPP.
- 2.c Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

2.d All OC emissions in this unit are assumed to be VOC emissions.

II. Operational Restrictions

1. The permittee shall operate the paint booth fabric filter system whenever this emissions unit is in operation.
2. Cleanup solvents that are photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) shall not be used in this emission unit.
3. Cleanup solvents and reduction solvents shall not contain HAP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for the coating operation:
 - a. the company identification for each coating and reduction solvent, including verification that the reduction solvent as applied is not a photochemically reactive material and contains no HAP;
 - b. the number of gallons of each coating employed for each day, as applied;
 - c. the OC content of each coating employed, in pounds per gallon as applied;
 - d. the total OC emissions rate for all coating as applied, in pounds per day;
 - e. the total number of hours the emission unit was in operation each day;
 - f. the individual HAP and total HAP content of each coating in pounds per gallon of coating and pounds per pound of coating solids as applied;
 - g. for each month, the following information on cleanup solvent:
 - i. the company identification for each cleanup material used;
 - ii. the identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;
 - iii. the gallons of cleanup material used per month;
 - iv. the pounds of OC per gallon of cleanup material;
 - v. the gallons of spent cleanup material recovered for disposal;
 - vi. the pounds of OC per gallon of spent cleanup material; and
 - vii. the pounds per month of OC emissions from cleanup; and
 - h. for each year, the tons of OC emitted from coatings and cleanup.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. any exceedance of the OC emission limits for coatings and cleanup materials and the OC emissions for each such day;
 - b. any day in which a HAP-containing reduction solvent or cleanup material was employed and the individual HAP emissions for each such day;
 - c. any time a photochemically reactive material was used as a cleanup solvent and the OC emissions resulting from this material for each such day; and
 - d. any day during which a coating was employed that exceeded the limitation of 0.16 pounds of HAP per pound of coating solids and the pounds of HAP per pound of coating solids for each such coating.
 - e. if no deviations, report no deviations.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section III.A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
0.55 lb PE/hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
0.16 pounds of organic HAP emissions per pound of coating solids for any coating material used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in Section III.A.III.1. The total HAP emissions per gallon of coating, as applied, as recorded in III.A.III.1.f shall be divided by the pounds of solid per gallon of coating as recorded in III.A.III.1.f, as applied.

- d. Emission Limitation:
8.0 pounds per hour and 40 pounds per day of OC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in Section III.A.III.1. The total OC emissions rate for all coating applied, in pounds per day, as recorded in section III.A.III.1.d shall not exceed 40 pounds per day. The total OC emissions rate for all coating applied, in pounds per day, as recorded in section III.A.III.1.d divided by 24 hours per day shall not exceed 8.0 per hour on an average.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emission unit K002 shall supersede all requirements for emission unit K002 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (K002) - Modification of Coating Line for fiberglass reinforced pultruded styrene resin to add MACT applicability.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See Section III.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 [K002] 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: methyl amyl ketone (MAK)
 TLV (mg/m3): 233.50
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 626.2
 MAGLC (ug/m3): 5,560

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: K002

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comfort Line Ltd**PTI Application: 04-01457****Issued: To be entered upon final issuance****Facility ID: 0448011664**

Emissions Unit ID: P001

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 - (P001) - Modification of Resin Blending Mixer 1 to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions, excluding emissions from non-VOC, non-photochemically reactive clean-up materials, shall not exceed 3.75 pounds per hour, 90.00 pounds per day, and 16.43 tons per year. See section III.A.1.2.b.</p> <p>OC emissions from clean-up materials from all mixing and pultrusion lines at the facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.1.2.f.</p>
OAC rule 3745-31-02(A)(2)	Particulate Emissions (PE) shall be less than 10.0 tons per year. See section III.A.1.2.d.
OAC rule 3745-17-07(A)	Visible Emissions (VE) from this emission unit shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	PE shall not exceed 2.58 pounds per hour.
40 CFR Part 63, Subpart A	See section III.A.1.2.e.
40 CFR Part 63, Subpart WWWW	See section III.A.1.2.c.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the mixing operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** Within three years of the effective date of this permit, the permittee shall comply with the requirements in 40 CFR Part 63, Subpart WWWW.
- 2.d** Permit to Install 04-01457 for this air contaminant source takes into account the use of a fabric filter system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.e** Table 15 to 40 CFR Part 63 Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.f** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever the emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

3. The permittee shall collect and record the following information for the month (total plantwide), except for cleanup on coating lines:
 - a. the company identification for each cleanup material employed;
 - b. an identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the total OC emissions rate for all cleanup material, in pounds per month, calculated as required in section III.A.V.1.d;
 - f. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month (all used is assumed to evaporate);
 - g. the monthly OC emission rate is calculated by no later than the first week of the following month from which the information was collected for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. the identification of each day during which the VOC emissions, excluding cleanup materials, from this emission unit exceeded 3.75 pounds per hour or 16.43 tons per year, and the actual VOC emissions for each such time period;
 - b. the identification of each day during which the VOC emissions, excluding cleanup materials, from this emission unit exceeded 90.00 pounds per day, and the actual VOC emissions for each such day;
 - c. an identification of each month during which the combined OC emissions, from cleanup materials from all emission units located at this facility other than the coating lines, exceeded 2.18 tons per month facility wide, and the actual OC emissions for each such month;
 - d. an identification of each month during which a HAP, a VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented; and
 - g. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

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Emissions Unit ID: P001

- a. Emission Limitation:
3.75 pounds of VOC per hour, excluding emission from cleanup materials.

Applicable Compliance Method:

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

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

- b. Emission Limitation:
90.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

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

where:

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

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

OC_i = the VOC content of mix (i), as specified in Section III.A.III.2.c, in percent by weight.

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

- c. Emission Limitation:
16.43 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

- d. Emission Limitation:
2.18 tons of OC per month, from cleanup materials facility wide.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

- e. Emission Limitation:
26.14 tons of OC per year, from cleanup materials facility wide.

Applicable Compliance Method:

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

- f. Emission Limitation:
2.58 pounds of PE per hour.

Applicable Compliance Method:

Compliance shall be based upon the following equation:

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

where:

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

$\text{CONC}_{\text{solid}}$ = maximum solids concentration in the mix, which is 625.0 lbs fillers/1000 lb batch as noted in the permit application.

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

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using Method 1-5 of 40 Part CFR 60, Appendix A.

- g. Emission Limitation:
Visible emissions shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emission Limitation:
PE shall be less than 10 tons per year.

Applicable Compliance Method:
The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(6.25 pounds/hour) \times (1-0.99)=0.06 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emissions unit P001 shall supercede all requirements for emission unit P001 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P001) - Modification of Resin Blending Mixer 1 to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section III.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 [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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P001

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 - (P002) - Modification of Pultrusion Line A equipped with a cut-off saw and a common baghouse to increase the allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 2.5 pounds per hour and 7.3 tons per year. See Section III.A.I.2.b. Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-17-07(A)	Visible emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a** The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate emissions from this air contaminant source since the potential to emit for particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements in 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
2.5 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

- d. Emission Limitation:
2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

- e. Emission Limitation:
26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

- f. Emission Limitation:
1.07 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emissions unit P003 shall supercede all requirements for emissions unit P003 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P002) - Modification of Pultrusion Line A equipped with a cut-off saw and a common baghouse to increase the allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section III.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 [P002] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

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Facility ID: 0448011664

Emissions Unit ID: P002

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comfort Line Ltd**PTI Application: 04-01457****Issued: To be entered upon final issuance****Facility ID: 0448011664**

Emissions Unit ID: P003

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 - (P003) - Modification of Pultrusion Line B equipped with a cut-off saw and a common baghouse to increase the allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 2.5 pounds per hour and 7.3 tons per year. See Section III.A.I.2.b.</p> <p>Organic compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.</p>
OAC rule 3745-17-07(A)	Visible emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a** The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate emissions from this air contaminant source since the potential to emit for particulate emissions is than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63 Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
2.5 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$$EF(OC_i) = 0.04$$

For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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PTI Application: 04-01457

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Facility ID: 0448011664

Emissions Unit ID: P003

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emissions unit P003 shall supercede all requirements for emissions unit P003 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P003) - Modification of Pultrusion Line B equipped with a cut-off saw and a common baghouse to increase the allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section III.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 [P003] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

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Emissions Unit ID: P003

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 - (P004) - Modification of Pultrusion Line C equipped with a cut-off saw and a common bag house to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 4.9 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR part 63, Subpart A	See section II.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate emissions from this air contaminant source since the potential to emit for particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section III.A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
4.9 pounds of VOC per hour, excluding emissions from cleanup material.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup material.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup material.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

PE shall not exceed 1.07 pounds per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P004

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emission unit P004 shall supercede all requirements for emission unit P003 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P004) - Modification of Pultrusion Line C equipped with a cut-off saw and a common bag house to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section III.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 [P004] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P004

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 - (P005) - Modification of Pultrusion Line D equipped with a cut-off saw and a common baghouse to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. OC emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) from this emission unit shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed (eg. styrene), in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed, in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP containing, VOC containing, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$$EF(OC_i) = 0.04$$

For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

- d. Emission Limitation:
2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

- e. Emission Limitation:
26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

- f. Emission Limitation:
1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P005

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emission unit P005 shall supercede all requirements for emission unit P005 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P005) - Modification of Pultrusion Line D equipped with a cut-off saw and a common baghouse to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P005] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P005

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comfort Line Ltd**PTI Application: 04-01457****Issued: To be entered upon final issuance****Facility ID: 0448011664**

Emissions Unit ID: P006

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 - (P006) - Modification of Pultrusion Line E equipped with a cut-off saw and a common baghouse to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. OC emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a** The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The VOC emissions from the resin bath operation consists of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate emissions from this air contaminant source since the potential to emit for particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which section of the General Provisions in 40 CFR Part 63, Subpart A apply to this emissions unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Emissions Unit ID: P006

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit to install for emission unit P006 shall supercede all requirements for emission unit P006 contained in Permit to Install 04-01436 (issued 4/13/2006).

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 - (P006) - Modification of Pultrusion Line E equipped with a cut-off saw and a common baghouse to increase allowable emissions.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P006] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

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Facility ID: 0448011664

Emissions Unit ID: P006

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 - (P007) - Resin Blending Mixer 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions, excluding emissions from non-photochemically reactive clean-up materials, shall not exceed 3.75 pounds per hour, 90.00 pounds per day, and 16.43 tons per year.</p> <p>OC emissions from clean-up materials from all mixing and pultrusion lines at the facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.f.</p>
OAC rule 3745-31-02(A)(2)	Particulate Emissions (PE) shall be less than 10.0 tons per year. See section III.A.I.2.d.
OAC rule 3745-17-07(A)	Visible Emissions (VE) from this emission unit shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	PE shall not exceed 2.58 pounds per hour.
40 CFR Part 63, Subpart A	See section III.A.III.2.e.
40 CFR Part 63, Subpart WWWW	See section III.A.I.2.c.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the mixing operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 2.d** Permit to Install 04-01457 for this air contaminant source takes into account the use of a fabric filter system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.e** Table 15 to 40 CFR Part 63 Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.f** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever the emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

3. The permittee shall collect and record the following information for the month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. an identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the total OC emissions rate for all cleanup material, in pounds per month, calculated as required in section III.A.V.1.d;
 - f. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month (all used is assumed to evaporate);
 - g. the monthly OC emission rate is calculated by no later than the first week of the following month from which the information was collected for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. the identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 3.75 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. the identification of each day during which the VOC emissions, excluding cleanup materials, from this emission unit exceeded 90.00 pounds per day or 16.43 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions, from cleanup materials from all emission units located at this facility other than the coating lines, exceeded 2.18 tons per month facility wide, and the actual OC emissions for each such month;
 - d. an identification of each month during which an HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented; and
 - g. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

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Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P007

- a. Emission Limitation:
3.75 pounds of VOC per hour, excluding emission from cleanup materials.

Applicable Compliance Method:

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

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

- b. Emission Limitation:
90.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

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

where:

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

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

OC_i = the VOC content of mix (i), as specified in Section III.A.III.2.c, in percent by weight.

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

- c. Emission Limitation:
16.43 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

- d. Emission Limitation:
2.18 tons of OC per month, from cleanup materials facility wide.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

- e. Emission Limitation:
26.14 tons of OC per year, from cleanup materials facility wide.

Applicable Compliance Method:

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

- f. Emission Limitation:
2.58 pounds of PE per hour.

Applicable Compliance Method:

Compliance shall be based upon the following equation:

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

where:

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

$\text{CONC}_{\text{solid}}$ = maximum solids concentration in the mix, which is 625.0 lbs fillers/1000 lb batch as noted in the permit application.

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

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using Method 1-5 of 40 Part CFR 60, Appendix A.

- g. Emission Limitation:
Visible emissions shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

- h. Emission Limitation:
PE shall be less than 10.0 tons per year.

Applicable Compliance Method:
The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(6.25 pounds/hour) \times (1-.99)=0.06 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/hour.

VI. Miscellaneous Requirements

None

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 - (P007) - Resin Blending Mixer 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See Section III.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 [P007] 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
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4
 MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P007

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 - (P008) - Pultrusion Line F equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Comfort Line Ltd

PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P008

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P008) - Pultrusion Line F equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P008] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

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Emissions Unit ID: P008

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 - (P009) - Pultrusion Line G equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (OC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. OC emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined VOC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual VOC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P009) - Pultrusion Line G equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P009] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

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Emissions Unit ID: P009

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 - (P010) - Pultrusion Line H equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Emissions Unit ID: P010

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P010) - Pultrusion Line H equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P010] 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
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4
 MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

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Facility ID: 0448011664

Emissions Unit ID: P010

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 - (P011) - Pultrusion Line I equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. OC emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P011) - Pultrusion Line I equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P011] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

PTI Application: 04-01457

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Facility ID: 0448011664

Emissions Unit ID: P011

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 - (P012) - Pultrusion Line J equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. OC emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a** The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed (eg. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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PTI Application: 04-01457

Issued: To be entered upon final issuance

Facility ID: 0448011664

Emissions Unit ID: P012

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P012) - Pultrusion Line J equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P012] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

Comfort Line Ltd

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Facility ID: 0448011664

Emissions Unit ID: P012

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 - (P013) - Pultrusion Line K equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See section III.A.I.2.b. Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion equipment at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See section III.A.I.2.e.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See Section III.A.I.2.b.
OAC rule 3745-17-07(A)	Visible Emissions (VE) shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.30 pounds per hour.
ORC 3704.03(T)(4)	See section III.A.I.2.c.
40 CFR Part 63, Subpart WWWW	See section III.A.II.3.
40 CFR Part 63, Subpart A	See section III.A.I.2.d.
OAC rule 3745-31-05(C)	See section II.A.1.

2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule is no more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- 2.c** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to uncontrolled particulate emissions from this air contaminant source since the potential to emit from particulate emissions is less than ten tons per year.
- 2.d** Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.e** The clean-up materials from all mixing and pultrusion lines shall include the following emission units: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013.

II. Operational Restrictions

- 1. The permittee shall operate the particulate control, fabric filter system whenever this emission unit is in operation.
- 2. The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- 3. Within three years of the effective date of this permit, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart WWWW.
- 4. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition and removal of materials.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed (eg. styrene), in pounds and identify how much of each resin was subject to preform injection or open bath pultrusion;
 - c. the VOC content of resin employed, in percent by weight;
 - d. the total VOC emissions rate for resin employed (eg. styrene), calculated as required in section III.A.V.1.b, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for resin employed (eg. styrene), calculated by (d)/(e), in average, pounds per hour.
3. The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in section III.A.V.1.d. (all used assumed to evaporate)
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP containing cleanup material or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period;
 - h. if no deviations, report no deviations.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- a. Emission Limitation:
3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in section III.A.III.2.d, by the number of actual hours that the emission unit was in operation, as recorded in section III.A.III.2.e.

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

- b. Emission Limitation:
40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

where:

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

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in III.A.III.2.b, in pounds per day.

OC_i = the VOC content of resin i , as specified in III.A.III.2.c, in percent by weight.

$EF(OC_i) = 0.04$
For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

- c. Emission Limitation:
7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

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

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

$$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$$

where:

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

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

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

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

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

f. Emission Limitation:

1.30 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

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Issued: To be entered upon final issuance

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Emissions Unit ID: P013

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE)$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade),
blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

- g. Emission Limitation:
VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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 - (P013) - Pultrusion Line K equipped with a cut-off saw and a common baghouse.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxic Policy	See section III.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 [P013] 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

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 221.4

MAGLC (ug/m3): 2028.6

2. 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.).
3. 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.

IV. Reporting Requirements

None

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V. Testing Requirements

None

VI. Miscellaneous Requirements

None