



09/22/2026

Robert DiSanza
Tencom Facility 2
7134 Railroad Street
Holland, OH 43528

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0326002045
Permit Number: P0141220
Permit Type: Initial Installation
County: Fulton

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices / Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Michigan; Indiana; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [*Weekly Review and Public Notices / Ohio Environmental Protection Agency*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [*HClerk@epa.ohio.gov*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation

Tencom Facility 2
265 Rogers St
Delta, OH 43515

ID#: P0141220

Date of Action: 09/22/2026

Permit Desc: Initial installation PTIO for 10 pultrusion lines and one resin mixing operation. Facility-wide solvent cleaning operations are also included in the federally enforceable limitations.

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit P0141220 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Tencom Facility 2 has installed a new manufacturing plant in Delta, Ohio (Fulton County) that produces reinforced plastic composite (RPC) products, with equipment to mix vinyl esters and/or polyester resins. The mixed resins are then placed into 10 pultrusion lines. The facility also uses polyurethane resins with low VOC content and no HAPs to make pultruded products on six additional pultrusion lines. Emissions from these six polyurethane pultrusion lines are de minimis air contaminant sources.

Cut-off saws are used on each of the 10 pultrusion lines being permitted to shape the final products. Each saw is exempt from permitting, as PM10 and PM2.5 emissions are routed to dust collectors that vent indoors with individual exhaust gas flow rates less than 4,000 ACFM and grain loadings less than 0.03 grain per dry standard cubic foot.

Facility-wide solvent cleaning materials are used to clean various parts of the pultrusion equipment, and VOC emissions (potential to emit 0.48 ton VOC/yr) from this cleaning activity are a de minimis air contaminant source (Emissions unit P802). The facility will be required to track actual VOC from this solvent cleaning operation to count towards the overall facility-wide VOC limit of 9.9 tons VOC per rolling, 12-month period to avoid record keeping requirements in OAC rule 3745-21-25.

This is an initial installation FEPTIO for:

P001 - Pultrusion line 6-1;

P002 - Pultrusion Line 6-2;

P003 - Pultrusion line 6-4;

P004 - Pultrusion line 6-9;

P005 - Pultrusion line 6-10;

P006 - Pultrusion line 6-11;

P007 - Pultrusion line 6-12;

P008 - Pultrusion line 6-14;

P009 - Pultrusion line 6-15;

P010 - Pultrusion line 6-16; and

P801 - Resin Mixing

Emissions from the pultrusion lines and resin mixing include PM10, PM2.5, VOC and styrene.

3. Facility Emissions and Attainment Status:

Tencom Facility 2 is an FEPTIO facility. The area where the plant is located in Fulton County is classified as attainment or unclassified for all criteria pollutants. Synthetic minor emissions limitations are being established for VOC at 9.9 tons/rolling, 12-month period (to comply with OAC rule 3745-21-25) and individual HAP (styrene) at 9.9 tons/rolling, 12-month period. The purpose of these limitations is to avoid



Title V permitting and maintain the facility HAP emissions less than 10 tons/yr for any individual HAP and less than 25 tons/yr for all HAPs, combined.

4. Source Emissions:

	PM10	PM2.5	SO2	NOx	VOC	CO	Styrene
Facility-wide emissions, considering synthetic minor restrictions (tons/yr)	0.90	0.90	0	0	9.9	0	9.9

5. Conclusion:

Emissions of VOC and individual HAPs (styrene) will each have limitations established at 9.9 tons per rolling, 12-month period for purpose of maintaining synthetic minor status for VOC and maintain the facility as a minor source of HAPs.

6. Please provide additional notes or comments as necessary:

The facility submitted a dispersion modeling analysis for styrene emissions using AERMOD. Modeling results indicated that ambient air impacts are within acceptable ground level concentrations.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.9
Individual HAP	9.9



**Environmental
Protection
Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Tencom Facility 2**

Facility ID:	0326002045
Permit Number:	P0141220
Permit Type:	Initial Installation
Issued:	09/22/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Tencom Facility 2

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Authorization

Facility ID: 0326002045
Application Number(s): A0081977A0081977
Permit Number: P0141220
Permit Description: Initial installation PTIO for 10 pultrusion lines and one resin mixing operation. Facility-wide solvent cleaning operations are also included in the federally enforceable limitations.
Permit Type: Initial Installation
Permit Fee: \$6,600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 09/22/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Tencom Facility 2
265 Rogers St
Delta, OH 43515

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number: P0141220

Permit Description: Initial installation PTIO for 10 pultrusion lines and one resin mixing operation. Facility-wide solvent cleaning operations are also included in the federally enforceable limitations.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P801
Company Equipment ID:	Resin Mixing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Group 1

Emissions Unit ID:	P003
Company Equipment ID:	Pultrusion line 6-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Pultrusion line 6-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Pultrusion line 6-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Pultrusion line 6-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Group 2

Emissions Unit ID:	P007
Company Equipment ID:	Pultrusion line 6-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Pultrusion line 6-14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Pultrusion line 6-15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P010
Company Equipment ID:	Pultrusion line 6-16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Hot Lines

Emissions Unit ID:	P001
Company Equipment ID:	Pultrusion line 6-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Pultrusion Line 6-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.



(1) None.

b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) B.2.a), B.2.b), B.2.c)(1), B.2.d)(1), d)(2) and B.2.e).

2. Applicable Emissions Limitations and/or Control Requirements

a) Pursuant to OAC Rule 3745-31-05(D), this permit establishes terms and conditions for the purpose of establishing federally enforceable requirements to limit the potential to emit of VOC and individual HAP (styrene) from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802*.

*Note: Emissions unit P802 is a de minimis air contaminant source for facility-wide solvent cleaning with a potential to emit of 0.48 ton VOC per year, which needs to be included for VOC emissions tracking for the rolling, 12-month period VOC emissions limitation in B.2.a)(1) below.

The following federally enforceable emission limitations are based on the operational restrictions contained in B.2.b):

(1) Annual VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined, shall not exceed 9.90 tons per rolling, 12-month period.

Annual individual HAP (styrene) emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined, shall not exceed 9.90 tons per rolling, 12-month period.

(2) Additional Terms and Conditions

a. The federally enforceable requirements are being established for purposes of avoiding TV and MACT applicability, as well as the requirements of OAC rule 3745-21-25.

b) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n (V_r)(P_r)(EF_r) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right) + (V_i)(G_i) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right) + (V_c)(G_c) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right) \leq 9.90$$

Where:

M = the increment of the rolling, 12-month period;

n = total number of unique VOC containing materials employed;

For any monomer containing material employed:

V_r = monomer content of each catalyzed resin (expressed as VOC in percent by weight)

P_r = pounds used of each catalyzed resin for the rolling 12-month period

EF_r = emissions factor(s), for each process that uses catalyzed resin



Note: the emission factors used include the emission reductions associated with the use of covers for emissions unit P801 (50% control).

For any non-monomer material* employed:

V_i = VOC content, in pounds per gallon; and

G_i = quantity used of each VOC containing material, in gallons, for the rolling 12-month period.

* Non-monomer material means any VOC containing material used in conjunction with emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined that does not participate in catalytic reactions and is associated with a process that would be considered an affected operation under OAC-3745-21-25(C)(1).

For cleanup materials employed:

V_c : VOC content, in pounds per gallon; and

G_c : quantity used of each cleanup material, in gallons, for the rolling 12-month period.

- (2) The maximum rolling, 12-month quantity of individual HAP-containing materials employed in emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n (V_r)(P_r)(EF_r) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right) \leq 9.90$$

Where:

M = the increment of the rolling, 12-month period;

n = total number of unique individual HAP containing materials employed

For any monomer containing material employed:

V_r = monomer content of each catalyzed resin (expressed as individual HAP in percent by weight)

P_r = pounds used of each catalyzed resin for the rolling 12-month period

EF_r = emissions factor(s), for each process that uses catalyzed resin

For any cleanup material employed:

Note : The emission factors used include the emission reductions associated with the use of covers for emissions unit P801 (50% control).

- (3) To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the emission levels of VOC and individual HAP (styrene) are limited by the following:

Maximum Allowable Cumulative Emissions of VOC and Individual HAP (Styrene)

Month(s)	VOC (Tons)	Individual HAP (styrene) (Tons)
1	1.00	1.00
1-3	3.00	3.00



1-6	6.00	6.00
1-9	9.00	9.00
1-12	9.90	9.90

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

- (4) The federally enforceable emissions limitations of 9.90 tons of VOC and individual HAP (styrene) per rolling, 12-month period is also based on the operational restrictions specified in the terms and conditions for each emission unit. See individual emissions unit conditions C.1.c), C.2.c), C.3.c) and C.4.c).

c) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined:

For any monomer containing material mixed or employed:

- the company name and identification of each catalyzed resin;
- the monomer content of each catalyzed resin, (expressed as VOC and individual HAP in percent by weight);
- the quantity of each catalyzed resin used, in pounds or tons;
- the emission factor(s)* used for each process that uses catalyzed resin;
- the VOC and individual HAP (styrene) emissions from each catalyzed resin, in pounds or tons; and
- the total VOC and individual HAP (styrene) emissions from all catalyzed resins, in tons [summation of c)(1)e.].

For any non-monomer material employed containing VOC:

- the company name and identification of each material;
- the VOC content** of each material, in pounds per gallon;
- the quantity of each material, in gallons;
- the VOC emissions from each material, in pounds or tons; and
- the total VOC emissions from all materials, in tons; [summation of c)(1)j.].

For all materials:

- the total VOC and individual HAP (styrene) emissions from all monomer and non-monomer materials employed [summation of c)(1)f. and c)(1)k.].
- during the first 12 calendar months of operation following the issuance of this permit, the cumulative VOC and individual HAP (styrene) emissions for each calendar month, in tons; and
- beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC and individual HAP (styrene) emissions, in tons.



*The emission factors used shall be consistent with those supplied by the permittee in application #A0081977, dated 8/14/2026, including the use of the emission reductions associated with the use of covers as specified in B.2.b). Any additional or revised emission factors should be developed in a manner consistent with the methods and procedures specified in OAC rule 3745-21-25.

**Formulation data, or U.S. EPA Method 24 or 311, shall be used to determine the VOC and HAP content of each material.

- (2) In accordance with the requirements specified in OAC rule 3745-21-25(A)(2)(e), the permittee shall maintain up-to-date records of the potential to emit for VOC from all reinforced plastic composites production operations, including all emission factors or emission estimates used in the calculations.

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit of any regulated air pollutant have and been detected by the monitoring, recordkeeping and/or testing requirements in this permit.
 - i. all exceedances of the emission limitation of 9.90 tons of VOC per rolling, 12-month period;
 - ii. all exceedance of the emission limitation of 9.90 tons of individual HAP (styrene) per rolling, 12-month period; and
 - iii. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC and individual HAP (styrene) emission levels specified in B.2.b)(3).
 - b. the probable cause for each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Northwest District Office (NWDO).

- (2) All applications, notifications, or reports required in writing are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the NWDO, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule



3745-15-03, the application, notification, or report is considered submitted on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

e) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

9.90 tons of VOC per rolling, 12-month period for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined

Applicable Compliance Method

The permittee shall demonstrate compliance with this emission limitation based on the recordkeeping specified in condition B.2.c)(1).

b. Emission Limitation:

9.90 tons of individual HAP (styrene) per rolling, 12-month period for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P801 and P802, combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation based on the recordkeeping specified in condition B.2.c)(1).

f) Miscellaneous Requirements

- (1) None.



**Environmental
Protection
Agency**

Draft Permit-to-Install and Operate

Tencom Facility 2

Permit Number: P0141220

Facility ID: 0326002045

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. P801, Resin Mixing

Operations, Property and/or Equipment Description:

Resin Mixing Operations

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d., b)(2)d., d)(3) through d)(6) and e)(2).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., b)(2)c., c)(1), c)(2), d)(1), d)(2), e)(1) and f)(1).

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.24 lb VOC/hr See Facility-Wide Term and Condition B.2.a) See b)(2)a., b)(2)b., b)(2)c., c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to this air contaminant source because the uncontrolled potential to emit for VOC is less than 10 tons per year.
c.	OAC rule 3745-21-25(A)(2)(e)	See Facility-Wide Term and Condition B.2.c)(2).
d.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See b)(2)d., d)(3) through d)(6) and e)(2).

(2) Additional Terms and Conditions

- a. The emission limitation of 0.24 lb VOC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.



- b. The operational restrictions specified in conditions c)(1), c)(2), and c)(3) are part of the federally enforceable requirements established under OAC rule 3745-31-05(D). See B.2.b)(2). of the facility wide terms and conditions.
- c. All cleanup materials for this emissions unit that contain VOC are accounted for in emissions unit P802 – facility-wide solvent cleaning, which is a de minimis air contaminant source.
- d. In order to demonstrate compliance with the Toxic Air Contaminant Statute, the director has established, per ORC 3704.03(F)(4)(c), a styrene limit for stack 1 and stack 2 of 117.34 lbs of per day per stack from emissions units P001-P010 and P801, combined. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application by the emissions rate modeled (to determine the ground level concentration).

c) Operational Restrictions

- (1) All mixers associated with this emissions unit shall be equipped with covers for the purpose of reducing VOC and organic HAP emissions. The mixers and covers shall be designed, installed, operated and maintained in a manner consistent with the requirements for mixing operations and the VOC-containing materials storage operations as specified in Table 1 of OAC rule 3745-21-25.
- (2) The catalyzed resins mixed in this emissions unit shall have a maximum monomer content of 38.7 percent by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document and maintain records of the following information for emissions unit P801:
 - a. the company name and identification of each catalyzed resin mixed;
 - b. the monomer content of each catalyzed resin, in percent by weight; and
 - c. the company name and identification of each cleanup material employed.
- (2) The permittee shall maintain a certified statement that operations are in compliance with the work practice standards specified in c)(1).
- (3) The FEPTIO application for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):



- i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
 - d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant or *worst-case* scenario:

- i. Toxic Contaminant: Styrene

TLV (mg/m³): 42.6 (From ACGIH's "2026 TLVs and BEIs" Book)

Maximum Hourly Emissions Rate (lb/hr): 9.778

Predicted One-Hour Maximum Ground-Level Concentration (µg/m³): 919.3

MAGLC (µg/m³): 1,014.2

The permittee, having demonstrated that emissions of Styrene, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801, are estimated to be equal to or greater than 80 percent, but less than 100 percent of the MAGLC, shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.



- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
- c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute ORC 3704.03(F)*:

- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
- b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute, ORC 3704.03(F)*.
- c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
- d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

- (6) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. the operational restriction specified in c)(1) requiring the use of closed covers and proper material storage operations;
 - ii. the maximum allowable monomer content specified in c)(2); and
 - iii. the operational restriction specified in c)(3) requiring the use of non-VOC containing cleanup materials;
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the NWD0).

- (2) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions units or the exhaust stacks have been made, then the report shall include a statement to this effect.
- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.24 lb VOC/hr

Applicable Compliance Method

The emission limitation of 0.24 lb VOC/hr represents the potential to emit, demonstrated with calculations provided by the permittee in application #A0081977, dated 8/14/2026.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA



guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Group 1: P003, P004, P005, P006

EU ID	Operations, Property and/or Equipment Description
P003	Pultrusion line 6-4
P004	Pultrusion line 6-9
P005	Pultrusion line 6-10
P006	Pultrusion line 6-11

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., b)(2)g., d)(2) through d)(5) and e)(2).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., b)(2)f., c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	1.59 lbs VOC/hr for each emissions unit, individually See Facility-Wide Term and Condition B.2.a) See b)(2)a., b)(2)b., b)(2)f. and c)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to these air contaminant sources because the uncontrolled potential to emit for VOC, PM10 and PM2.5 are each less than 10 tons per year. [See b)(2)e.]
c.	OAC rule 3745-21-25(A)(2)(e)	See Facility-Wide Term and Condition B.2.c)(2).
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	OAC rule 3745-114-01	See b)(2)g., d)(2) through d)(5) and e)(2).



	ORC 3704.03(F)(4)	
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(2) Additional Terms and Conditions

- a. The emission limitation of 1.59 lbs VOC/hr was established to reflect the potential to emit for each of these emissions units. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.
- b. The operational restrictions specified in conditions c)(1) and c)(2) are part of the federally enforceable requirements established under OAC rule 3745-31-05(D). See B.2.b)(2). of the facility wide terms and conditions.
- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(22).
- e. PM10 and PM2.5 emissions associated with these emissions units are from cutoff saws that are used at the end of each polyester resin pultrusion line. These saws are routed to local interior dust collection units that vent inside the building, for control of PM10 and PM2.5 emissions. Each saw exhaust has airflow less than 4,000 ACFM and a grain loading rate of less than 0.03 grain/dscf.
- f. All cleanup materials for this emissions unit that contain VOC are accounted for in emissions unit P802 – facility-wide solvent cleaning, which is a de minimis air contaminant source.
- g. In order to demonstrate compliance with the Toxic Air Contaminant Statute, the director has established, per ORC 3704.03(F)(4)(c), a styrene limit for stack 1 and stack 2 of 117.34 lbs of per day per stack from emissions units P001-P010 and P801, combined. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application by the emissions rate modeled (to determine the ground level concentration).

c) Operational Restrictions

- (1) The catalyzed resins employed in these emissions units shall have a maximum monomer content of 36.8 percent by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document and maintain records of the following information for emissions units P003, P004, P005 and P006:
 - a. the company name and identification of each catalyzed resin employed;
 - b. the monomer content of each catalyzed resin, in percent by weight; and
 - c. the company name and identification of each cleanup material employed.
- (2) The FEPTIO application for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air*



Contaminant Statute, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
 - b. The TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
 - d. The resulting calculation shall be used to determine the MAGLC:
- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant or *worst-case* scenario:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- i. Toxic Contaminant: Styrene

TLV (mg/m³): 42.6 (From ACGIH’s “2026 TLVs and BEIs” Book)

Maximum Hourly Emissions Rate (lb/hr): 9.778

Predicted One-Hour Maximum Ground-Level Concentration (µg/m³): 919.3

MAGLC (µg/m³): 1,014.2

The permittee, having demonstrated that emissions of Styrene, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801, are estimated to be equal to or greater than 80 percent, but less than 100 percent of the MAGLC, shall not operate the



emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute* ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.



- d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) **Reporting Requirements**
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the maximum allowable monomer content specified in c)(1).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the NWDO).
 - (2) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions units or the exhaust stacks have been made, then the report shall include a statement to this effect.
 - (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
1.59 lbs VOC/hr



Applicable Compliance Method

The emission limitation of 1.59 lbs VOC/hr represents the potential to emit, demonstrated with calculations provided by the permittee in application #A0081977, dated 8/14/2026.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Group 2: P007, P008, P009, P010

EU ID	Operations, Property and/or Equipment Description
P007	Pultrusion line 6-12
P008	Pultrusion line 6-14
P009	Pultrusion line 6-15
P010	Pultrusion line 6-16

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., b)(2)g., d)(2) through d)(5) and e)(2).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., b)(2)f., c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.73 lb VOC/hr for each emissions unit, individually See Facility-Wide Term and Condition B.2.a) See b)(2)a., b)(2)b., b)(2)f. and c)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to these air contaminant sources because the uncontrolled potential to emit for VOC, PM10 and PM2.5 are each less than 10 tons per year. [See b)(2)e.]
c.	OAC rule 3745-21-25(A)(2)(e)	See Facility-Wide Term and Condition B.2.c)(2).
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See b)(2)g., d)(2) through d)(5) and e)(2).



(2) Additional Terms and Conditions

- a. The emission limitation of 0.73 lb VOC/hr was established to reflect the potential to emit for each of these emissions units. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.
- b. The operational restrictions specified in conditions c)(1) and c)(2) are part of the federally enforceable requirements established under OAC rule 3745-31-05(D). See B.2.b)(2). of the facility wide terms and conditions.
- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The uncontrolled mass rate of PE* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(22).
- e. PM10 and PM2.5 emissions associated with these emissions units are from cutoff saws that are used at the end of each polyester resin pultrusion line. These saws are routed to local interior dust collection units that vent inside the building, for control of PM10 and PM2.5 emissions. Each saw exhaust has airflow less than 4,000 ACFM and a grain loading rate of less than 0.03 grain/dscf.
- f. All cleanup materials for this emissions unit that contain VOC are accounted for in emissions unit P802 – facility-wide solvent cleaning, which is a de minimis air contaminant source.
- g. In order to demonstrate compliance with the Toxic Air Contaminant Statute, the director has established, per ORC 3704.03(F)(4)(c), a styrene limit for stack 1 and stack 2 of 117.34 lbs of per day per stack from emissions units P001-P010 and P801, combined. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application by the emissions rate modeled (to determine the ground level concentration).

c) Operational Restrictions

- (1) The catalyzed resins employed in these emissions units shall have a maximum monomer content of 36.8 percent by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document and maintain records of the following information for emissions units P007, P008, P009 and P010:
 - a. the company name and identification of each catalyzed resin employed;
 - b. the monomer content of each catalyzed resin, in percent by weight; and
 - c. the company name and identification of each cleanup material employed.
- (2) The FEPTIO application for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air*



Contaminant Statute, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
 - b. The TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
 - d. The resulting calculation shall be used to determine the MAGLC:
- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant or *worst-case* scenario:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- i. Toxic Contaminant: Styrene

TLV (mg/m³): 42.6 (From ACGIH’s “2026 TLVs and BEIs” Book)

Maximum Hourly Emissions Rate (lb/hr): 9.778

Predicted One-Hour Maximum Ground-Level Concentration (µg/m³): 919.3

MAGLC (µg/m³): 1,014.2

The permittee, having demonstrated that emissions of Styrene, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801, are estimated to be equal to or greater than 80 percent, but less than 100 percent of the MAGLC, shall not operate the



emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute* ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.



- d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) **Reporting Requirements**
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the maximum allowable monomer content specified in c)(1).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the NWDO).
 - (2) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions units or the exhaust stacks have been made, then the report shall include a statement to this effect.
 - (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
0.73 lb VOC/hr



Applicable Compliance Method

The emission limitation of 0.73 lb VOC/hr represents the potential to emit, demonstrated with calculations provided by the permittee in application #A0081977, dated 8/14/2026.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Hot Lines: P001, P002

EU ID	Operations, Property and/or Equipment Description
P001	Pultrusion line 6-1
P002	Pultrusion Line 6-2

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., b)(2)g., d)(2) through d)(5) and e)(2).

- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., b)(2)f., c)(1), d)(1), e)(1) and f)(1).

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.14 lb VOC/hr for each emissions unit, individually See Facility-Wide Term and Condition B.2.a) See b)(2)a., b)(2)b., b)(2)f. and c)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to these air contaminant sources because the uncontrolled potential to emit for VOC, PM10 and PM2.5 are each less than 10 tons per year. See b)(2)e.
c.	OAC rule 3745-21-25(A)(2)(e)	See Facility-Wide Term and Condition B.2.c)(2).
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See b)(2)g., d)(2) through d)(5) and e)(2).

- (2) Additional Terms and Conditions



- a. The emission limitation of 0.14 lb VOC/hr was established to reflect the potential to emit for each of these emissions units. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.
 - b. The operational restrictions specified in conditions c)(1) and c)(2) are part of the federally enforceable requirements established under OAC rule 3745-31-05(D). See B.2.b)(2). of the facility wide terms and conditions.
 - c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - d. The uncontrolled mass rate of PE* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(22).
 - e. PM10 and PM2.5 emissions associated with these emissions units are from cutoff saws that are used at the end of each polyester resin pultrusion line. These saws are routed to local interior dust collection units that vent inside the building, for control of PM10 and PM2.5 emissions. Each saw exhaust has airflow less than 4,000 ACFM and a grain loading rate of less than 0.03 grain/dscf.
 - f. All cleanup materials for this emissions unit that contain VOC are accounted for in emissions unit P802 – facility-wide solvent cleaning, which is a de minimis air contaminant source.
 - g. In order to demonstrate compliance with the Toxic Air Contaminant Statute, the director has established, per ORC 3704.03(F)(4)(c), a styrene limit for stack 1 and stack 2 of 117.34 lbs of per day per stack from emissions units P001-P010 and P801, combined. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application by the emissions rate modeled (to determine the ground level concentration).
- c) Operational Restrictions
- (1) The catalyzed resins employed in these emissions units shall have a maximum monomer content of 38.7 percent by weight.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall document and maintain records of the following information for emissions units P001 and P002:
 - a. the company name and identification of each catalyzed resin employed;
 - b. the monomer content of each catalyzed resin, in percent by weight; and
 - c. the company name and identification of each cleanup material employed.
 - (2) The FEPTIO application for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion



model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant or *worst-case* scenario:
 - i. Toxic Contaminant: Styrene
TLV (mg/m³): 42.6 (From ACGIH's "2026 TLVs and BEIs" Book)
Maximum Hourly Emissions Rate (lb/hr): 9.778
Predicted One-Hour Maximum Ground-Level Concentration (µg/m³): 919.3
MAGLC (µg/m³): 1,014.2

The permittee, having demonstrated that emissions of Styrene, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010 and P801, are estimated to be equal to or greater than 80 percent, but less than 100 percent of the MAGLC, shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material



or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute* ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that



was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

- (5) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the maximum allowable monomer content specified in c)(1).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the NWDO).

- (2) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions units or the exhaust stacks have been made, then the report shall include a statement to this effect.
- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
0.14 lb VOC/hr
Applicable Compliance Method



The emission limitation of 0.14 lb VOC/hr represents the potential to emit, demonstrated with calculations provided by the permittee in application #A0081977, dated 8/14/2026.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g) Miscellaneous Requirements

(1) None.