



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

02/09/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

R001 (Mat chop booth 001)

Creative Mold & Machine Inc (02-28-00-0245)
Greg Davis
PO Box 323
Newbury, OH 44065

Dear Greg Davis:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 02/09/04

Expiration Date: 02/09/09

This document constitutes issuance to

Facility ID: 02-28-00-0245
Creative Mold & Machine Inc
10385 KINSMAN ROAD
NEWBURY, OH 44065

of a permit to operate for:

R001 (Mat chop booth 001)

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth for lay-up of polyester resin mixes to make fiberglass reinforced plastic (FRP) parts	OAC rule 3745-21-07 (G)(2)	Emissions of organic compounds (OC) from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05 (A)(5) PTI No. 02-7993	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07 (G)(2).
	OAC rule 3745-35-07 (B)(2)	See sections A.2.a - A.2.c, B.1, and B.2 of these terms and conditions.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent (20%) opacity as a 6-minute average.
	OAC rule 3745-17-11 (B)	The particulate emissions from this emissions unit shall not in excess of 0.551 pounds per hour.

2. Additional Terms and Conditions

- 2.a Emissions from this emissions unit shall not exceed 3.0 tons per year of any single hazardous air pollutant (HAP), based upon a rolling, 12-month summation. Styrene is the only HAP emitted from this emissions unit.
- 2.b The OC emissions from the lay-up operations consist only of styrene.
- 2.c This emissions unit shall not employ cleanup materials that contain any HAP.

B. Operational Restrictions

1. The styrene content of each resin employed shall not exceed 44% by weight
 Resin usage from this emissions unit shall be limited to 431 gallons per month.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit
 - a. the name and company identification for each lay-up (i.e., resin mix) and cleanup material employed;
 - b. an identification of whether each resin mix is a vapor suppressed or non-vapor suppressed polyester resin mix;
 - a. a determination of whether or not each cleanup material contains any HAP;
 - d. an identification of whether or not the cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5);
 - e. the amount of each lay-up material employed, "Wi" in pounds per day.
 - f. the volume of each photochemically reactive cleanup material employed, "Vc", equal to the volume of each fresh photochemically reactive cleanup material required minus the volume of each used photochemically reactive cleanup material recovered for disposal, in gallons per day;
 - g. the OC content for each photochemically reactive cleanup material, "Coc", in pounds per gallon
 - h. the styrene content of each lay-up material, "SC", in percent by weight;
the actual number of hours this emissions unit was in operation, "OT", in hours per day;
the OC emissions from each lay-up material, "OCi", in pounds per day, calculated as follows

$$OCi = Wi \times EF$$

where,

EFi = the emission factor for the styrene emissions from the lay-up material ["EFi" shall be determined based on the styrene content, "SC", for lay-up material i, and whether the lay-up material i is a vapor suppressed or a non-vapor suppressed polyester resin, as noted in Table 2.16 of CFA Emission Models for the Reinforced Plastics Industries (February 1998)];

- k. the OC emissions from all lay-up materials, "OCI", in pounds per day, calculated as follows:

$$OCI = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (OCi)_i$$

where,

i = subscript denoting an individual lay-up material; and
n = the total number of different lay-up materials employed;

- l. the OC emissions from all photochemically reactive cleanup materials, "OCc", in pounds per day; calculated as the follows,

$$OCc = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (Vc \times Coc)_i$$

where,

i = subscript denoting an individual photochemically reactive cleanup material; and
n = the total number of different photochemically reactive cleanup materials employed,

- m. the total daily OC emissions from this emissions unit, "OCd", in pounds per day, calculated as follows

$$OCd = OCI + OCc$$

- n. the average hourly OC emission rate for this emissions unit, "OCh", in pounds per hour, calculated as follows:

$$OCh = (OCd) / (OT)$$

2. The permittee shall keep a monthly record of the total resin usage for this emissions unit, in gallons

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit:

a the total styrene (HAP) emissions, "SE", in tons, calculated as follows

SE = the sum, from $i = 1$ to $i = n$, of (OCI)_i

where,

i = subscript denoting an individual day of the month; and

n = the total number of different days in the month; and

b the rolling 12-month summation of the styrene (HAP) emissions, in tons

D. Reporting Requirements

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

a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day

c. An identification of each day during which a HAP was included in any cleanup material, and the actual HAP emissions from the cleanup material for each such day.

d. An identification of each month during which the monthly resin usage exceeded 431 gallons per month, and the actual resin usage for each such month.

e. An identification of each day during which the styrene content of each resin employed exceeded 44% by weight, and the actual styrene content for each such day.

f. An identification of each month during which the emissions of styrene exceeded 3.0 tons per year, based upon a rolling, 12-month summation, and the actual emissions of styrene, based upon a rolling, 12-month summation, for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total styrene emissions from the materials employed in this emissions unit, in tons per year. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 pounds per hour of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.
 - b. Emissions Limitation:
40 pounds per day of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.
 - c. Emissions Limitation:
3.0 tons per year of styrene emissions, based upon a rolling 12-month summation

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.3 of these terms and conditions.
 - d. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
 - e. Emission Limitation:
0.551 pounds per hour of particulate emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
2. Compliance with the limitations in Section B of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Styrene content of each resin employed shall not exceed 44% by weight

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1.g of these terms and conditions.
 - b. Emission Limitation:
Resin usage from this emissions unit shall be limited to 431 gallons per month

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2 of these terms and conditions.
3. Formulation data or Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the styrene contents and OC contents of the lay-up materials and cleanup materials employed in this emissions unit.

F. Miscellaneous Requirements

1. The emissions from this emissions unit are prohibited from causing a nuisance, in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.
2. Pursuant to OAC rule 3745-35-07 (B)(2), the following terms and conditions are federally enforceable: sections A-F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for styrene (HAP) and, therefore, avoid Title V applicability.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address

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

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

R002 (Mat chop booth 002)

02/09/04

Creative Mold & Machine Inc (02-28-00-0245)
Greg Davis
PO Box 323
Newbury, OH 44065

Dear Greg Davis:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date:

02/09/04

Expiration Date: 02/09/09

This document constitutes issuance to

Facility ID: 02-28-00-0245
Creative Mold & Machine Inc
10385 KINSMAN ROAD
NEWBURY, OH 44065

of a permit to operate for:

R002 (Mat chop booth 002)

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth for lay-up of polyester resin mixes to make fiberglass reinforced plastic (FRP) parts	OAC rule 3745-21-07 (G)(2)	Emissions of organic compounds (OC) from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05 (A)(5) PTI No. 02-7993	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07 (G)(2).
	OAC rule 3745-35-07 (B)(2)	See sections A.2.a - A.2.c, B.1, and B.2 of these terms and conditions.
	OAC rule 3745-17-11 (B)	The particulate emissions from this emissions unit shall not in excess of 0.551 pounds per hour.
	OAC rule 3745-17-07 (A) (1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent (20%) opacity as a 6-minute average.

2 Additional Terms and Conditions

- 2.a Emissions from this emissions unit shall not exceed 2.0 tons per year of any single hazardous air pollutant (HAP), based upon a rolling, 12-month summation. Styrene is the only HAP emitted from this emissions unit.
- 2.b The OC emissions from the lay-up operations consist only of styrene.
- 2.c This emissions unit shall not employ cleanup materials that contain any HAP

B. Operational Restrictions

1. The styrene content of each resin employed shall not exceed 44% by weight
2. Resin usage from this emissions unit shall be limited to 287 gallons per month

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit
 - a. the name and company identification for each lay-up (i.e., resin mix) and cleanup material employed
 - b. an identification of whether each resin mix is a vapor suppressed or non-vapor suppressed polyester resin mix;
 - c. a determination of whether or not each cleanup material contains any HAP;
 - d. an identification of whether or not the cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5);
 - e. the amount of each lay-up material employed, "Wi", in pounds per day;
 - f. the volume of each photochemically reactive cleanup material employed, "Vc", equal to the volume of each fresh photochemically reactive cleanup material required minus the volume of each used photochemically reactive cleanup material recovered for disposal, in gallons per day;
 - g. the OC content for each photochemically reactive cleanup material, "Coc", in pounds per gallon;
 - h. the styrene content of each lay-up material, "SC", in percent by weight;
the actual number of hours this emissions unit was in operation, "OT", in hours per day;
the OC emissions from each lay-up material, "OCi", in pounds per day, calculated as follows:

$$OC_i = W_i \times EF$$

where,

EF_i = the emission factor for the styrene emissions from the lay-up material ["EF_i" shall be determined based on the styrene content, "SC", for lay-up material i, and whether the lay-up material i is a vapor suppressed or a non-vapor suppressed polyester resin, as noted in Table 2.16 of CFA Emission Models for the Reinforced Plastics Industries (February 1998)];

- k. the OC emissions from all lay-up materials, "OC_I", in pounds per day, calculated as follows

$$OC_I = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (OC_i)_i.$$

where,

i = subscript denoting an individual lay-up material; and

n = the total number of different lay-up materials employed;

- l. the OC emissions from all photochemically reactive cleanup materials, "OC_c", in pounds per day, calculated as the follows,

$$OC_c = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (V_c \times Coc)_i.$$

where,

i = subscript denoting an individual photochemically reactive cleanup material; and

n = the total number of different photochemically reactive cleanup materials employed;

- m. the total daily OC emissions from this emissions unit, "OC_d", in pounds per day, calculated as follows:

$$OC_d = OC_I + OC_c$$

- n. the average hourly OC emission rate for this emissions unit, "OC_h", in pounds per hour, calculated as follows:

$$OC_h = (OC_d) / (OT)$$

2. The permittee shall keep a monthly record of the total resin usage for this emissions unit, in gallons

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the total styrene (HAP) emissions, "SE", in tons, calculated as follows

SE = the sum, from $i = 1$ to $i = n$, of (OCI)_i.

where,

i = subscript denoting an individual day of the month; and

n = the total number of different days in the month; and

b. the rolling 12-month summation of the styrene (HAP) emissions, in tons.

D. Reporting Requirements

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

a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

c. An identification of each day during which a HAP was included in any cleanup material, and the actual HAP emissions from the cleanup material for each such day.

d. An identification of each month during which the monthly resin usage exceeded 287 gallons per month, and the actual resin usage for each such month.

e. An identification of each day during which the styrene content of each resin employed exceeded 44% by weight, and the actual styrene content for each such day.

f. An identification of each month during which the emissions of styrene exceeded 2.0 tons per year, based upon a rolling, 12-month summation, and the actual emissions of styrene, based upon a rolling, 12-month summation, for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total styrene emissions from the materials employed in this emissions unit, in tons per year. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitation:
8 pounds per hour of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.

b. Emissions Limitation:
40 pounds per day of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.

c. Emissions Limitation:
2.0 tons per year of styrene emissions, based upon a rolling 12-month summation

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.3 of these terms and conditions.

d. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).

e. Emission Limitation:
0.551 pounds per hour of particulate emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

2. Compliance with the limitations in Section B of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
Styrene content of each resin employed shall not exceed 44% by weight

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1.g of these terms and conditions.

b. Emission Limitation:
Resin usage from this emissions unit shall be limited to 287 gallons per month

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2 of these terms and conditions.

3. Formulation data or Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the styrene contents and OC contents of the lay-up materials and cleanup materials employed in this emissions unit.

F. Miscellaneous Requirements

1. The emissions from this emissions unit are prohibited from causing a nuisance, in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.
2. Pursuant to OAC rule 3745-35-07 (B)(2), the following terms and conditions are federally enforceable: sections A-F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for styrene (HAP) and, therefore, avoid Title V applicability.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

CERTIFIED MAIL

02/09/04

RE: Final Chapter 3745-35 Permit To Operate

R003 (Mat chop booth 003)

Creative Mold & Machine Inc (02-28-00-0245)
Greg Davis
PO Box 323
Newbury, OH 44065

Dear Greg Davis

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date

02/09/04

Expiration Date: 02/09/09

This document constitutes issuance to

Facility ID: 02-28-00-0245
Creative Mold & Machine Inc
10385 KINSMAN ROAD
NEWBURY, OH 44065

of a permit to operate for:

R003 (Mat chop booth 003)

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth for lay-up of polyester resin mixes to make fiberglass reinforced plastic (FRP) parts	OAC rule 3745-21-07 (G)(2)	Emissions of organic compounds (OC) from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05 (A)(5) PTI No. 02-7993	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07 (G)(2).
	OAC rule 3745-35-07 (B)(2)	See sections A.2.a - A.2.c, B.1, and B.2 of these terms and conditions.
	OAC rule 3745-17-11 (B)	The particulate emissions from this emissions unit shall not in excess of 0.551 pounds per hour.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent (20%) opacity as a 6-minute average.

2. Additional Terms and Conditions

- 2.a Emissions from this emissions unit shall not exceed 2.0 tons per year of any single hazardous air pollutant (HAP), based upon a rolling, 12-month summation. Styrene is the only HAP emitted from this emissions unit.
- 2.b The OC emissions from the lay-up operations consist only of styrene
- 2.c This emissions unit shall not employ cleanup materials that contain any HAP.

B. Operational Restrictions

1. The styrene content of each resin employed shall not exceed 44% by weight.
2. Resin usage from this emissions unit shall be limited to 287 gallons per month

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and company identification for each lay-up (i.e., resin mix) and cleanup material employed
 - b. an identification of whether each resin mix is a vapor suppressed or non-vapor suppressed polyester resin mix;
 - c. a determination of whether or not each cleanup material contains any HAP;
 - d. an identification of whether or not the cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5);
 - e. the amount of each lay-up material employed, "Wi", in pounds per day;
 - f. the volume of each photochemically reactive cleanup material employed, "Vc", equal to the volume of each fresh photochemically reactive cleanup material required minus the volume of each used photochemically reactive cleanup material recovered for disposal, in gallons per day;
 - g. the OC content for each photochemically reactive cleanup material, "Coc", in pounds per gallon
 - h. the styrene content of each lay-up material, "SC", in percent by weight;
the actual number of hours this emissions unit was in operation, "OT", in hours per day;
the OC emissions from each lay-up material, "OCi", in pounds per day, calculated as follows

$$OC_i = W_i \times EFi$$

where,

EFi = the emission factor for the styrene emissions from the lay-up material ["EFi" shall be determined based on the styrene content, "SC", for lay-up material i, and whether the lay-up material i is a vapor suppressed or a non-vapor suppressed polyester resin, as noted in Table 2.16 of CFA Emission Models for the Reinforced Plastics Industries (February 1998)];

- k. the OC emissions from all lay-up materials, "OCI", in pounds per day, calculated as follows:

$$OCI = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (OC_i)_i.$$

where,

i = subscript denoting an individual lay-up material; and

n = the total number of different lay-up materials employed;

- l. the OC emissions from all photochemically reactive cleanup materials, "OCc", in pounds per day, calculated as the follows,

$$OC_c = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (V_c \times C_{oc})_i.$$

where,

i = subscript denoting an individual photochemically reactive cleanup material; and

n = the total number of different photochemically reactive cleanup materials employed;

- m. the total daily OC emissions from this emissions unit, "OCd", in pounds per day, calculated as follows:

$$OC_d = OCI + OC_c$$

- n. the average hourly OC emission rate for this emissions unit, "OCh", in pounds per hour, calculated as follows:

$$OCh = (OC_d) / (OT)$$

2. The permittee shall keep a monthly record of the total resin usage for this emissions unit, in gallons

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the total styrene (HAP) emissions, "SE", in tons per month, calculated as follows

SE = the sum, from $i = 1$ to $i = n$, of $(OCI)_i$.

where,

i = subscript denoting an individual day of the month; and

n = the total number of different days in the month; and

b. the rolling 12-month summation of the styrene (HAP) emissions, in tons.

D. Reporting Requirements

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

a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

c. An identification of each day during which a HAP was included in any cleanup material, and the actual HAP emissions from the cleanup material for each such day.

d. An identification of each month during which the monthly resin usage exceeded 287 gallons per month, and the actual resin usage for each such month.

e. An identification of each day during which the styrene content of each resin employed exceeded 44% by weight, and the actual styrene content for each such day.

f. An identification of each month during which the emissions of styrene exceeded 2.0 tons per year, based upon a rolling, 12-month summation, and the actual emissions of styrene, based upon a rolling, 12-month summation, for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total styrene emissions from the materials employed in this emissions unit, in tons per year. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 pounds per hour of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.
 - b. Emissions Limitation:
40 pounds per day of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C. of these terms and conditions.
 - c. Emissions Limitation:
2.0 tons per year of styrene emissions, based upon a rolling 12-month summation

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.3 of these terms and conditions.
 - d. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
 - e. Emission Limitation:
0.551 pounds per hour of particulate emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
2. Compliance with the limitations in Section B of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Styrene content of each resin employed shall not exceed 44% by weight

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1.g of these terms and conditions.
 - b. Emission Limitation:
Resin usage from this emissions unit shall be limited to 287 gallons per month

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2 of these terms and conditions.
3. Formulation data or Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the styrene contents and OC contents of the lay-up materials and cleanup materials employed in this emissions unit.

F. Miscellaneous Requirements

1. The emissions from this emissions unit are prohibited from causing a nuisance, in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.
2. Pursuant to OAC rule 3745-35-07 (B)(2), the following terms and conditions are federally enforceable: sections A-F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for styrene (HAP) and, therefore, avoid Title V applicability.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

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

02/09/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

R004 (Gelcoat booth 004)

Creative Mold & Machine Inc (02-28-00-0245)
Greg Davis
PO Box 323
Newbury, OH 44065

Dear Greg Davis

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date:

02/09/04

Expiration Date 02/09/09

This document constitutes issuance to

Facility ID: 02-28-00-0245
Creative Mold & Machine Inc
10385 KINSMAN ROAD
NEWBURY, OH 44065

of a permit to operate for:

R004 (Gelcoat booth 004)

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray booth for gelcoat to fiberglass reinforced plastic (FRP) parts	OAC rule 3745-21-07 (G)(2)	Emissions of organic compounds (OC) from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05 (A)(5) PTI No. 02-7993	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07 (G)(2).
	OAC rule 3745-35-07 (B)(2)	See sections A.2.a - A.2.c, B.1, and B.2 of these terms and conditions.
	OAC rule 3745-17-11 (B)	The particulate emissions from this emissions unit shall not in excess of 0.551 pounds per hour.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed twenty percent (20%) opacity as a 6-minute average.

2. Additional Terms and Conditions

- 2.a Emissions from this emissions unit shall not exceed 2.5 tons per year of any single hazardous air pollutant (HAP), based upon a rolling, 12-month summation. Styrene is the only HAP emitted from this emissions unit.
- 2.b The OC emissions from the lay-up operations consist only of styrene
- 2.c This emissions unit shall not employ cleanup materials that contain any HAP

B. Operational Restrictions

1. The styrene content of each resin employed shall not exceed 44% by weight.
2. Resin usage from this emissions unit shall be limited to 270 gallons per month.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and company identification for each lay-up (i.e., resin mix) and cleanup material employed
 - b. an identification of whether each resin mix is a vapor suppressed or non-vapor suppressed polyester resin mix;
 - c. a determination of whether or not each cleanup material contains any HAP;
 - d. an identification of whether or not the cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5);
 - e. the amount of each lay-up material employed, "Wi", in pounds per day;
 - f. the volume of each photochemically reactive cleanup material employed, "Vc", equal to the volume of each fresh photochemically reactive cleanup material required minus the volume of each used photochemically reactive cleanup material recovered for disposal, in gallons per day;
 - g. the OC content for each photochemically reactive cleanup material, "Coc", in pounds per gallon;
 - h. the styrene content of each lay-up material, "SC", in percent by weight:

the actual number of hours this emissions unit was in operation, "OT", in hours per day;

the OC emissions from each lay-up material, "OCi", in pounds per day, calculated as follows

$$OCi = Wi \times EFi$$

where,

EFi = the emission factor for the styrene emissions from the lay-up material ["EFi" shall be determined based on the styrene content, "SC", for lay-up material i, and whether the lay-up material i is a vapor suppressed or a non-vapor suppressed polyester resin, as noted in Table 2.16 of CFA Emission Models for the Reinforced Plastics Industries (February 1998)];

- k. the OC emissions from all lay-up materials, "OCI", in pounds per day, calculated as follows

$$OCI = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (OCi)i.$$

where,

i = subscript denoting an individual lay-up material; and

n = the total number of different lay-up materials employed;

- l. the OC emissions from all photochemically reactive cleanup materials, "OCc", in pounds per day, calculated as follows,

$$OCc = \text{the sum, from } i = 1 \text{ to } i = n, \text{ of } (Vc \times Coc)i.$$

where,

i = subscript denoting an individual photochemically reactive cleanup material; and

n = the total number of different photochemically reactive cleanup materials employed;

- m. the total daily OC emissions from this emissions unit, "OCd", in pounds per day, calculated as follows

$$OCd = OCI + OCc$$

- n. the average hourly OC emission rate for this emissions unit, "OCh", in pounds per hour, calculated as follows:

$$OCh = (OCd) / (OT)$$

2. The permittee shall keep a monthly record of the total resin usage for this emissions unit, in gallons

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit.

a. the total styrene (HAP) emissions, "SE", in tons per month, calculated as follows:

SE = the sum, from $i = 1$ to $i = n$, of $(OCI)_i$.

where,

i = subscript denoting an individual day of the month; and

n = the total number of different days in the month; and

b. the rolling 12-month summation of the styrene emissions, in tons.

D. Reporting Requirements

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

a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

c. An identification of each day during which a HAP was included in any cleanup material, and the actual HAP emissions from the cleanup material for each such day.

d. An identification of each month during which the monthly resin usage exceeded 270 gallons per month, and the actual resin usage for each such month.

e. An identification of each day during which the styrene content of each resin employed exceeded 44% by weight, and the actual styrene content for each such day.

f. An identification of each month during which the emissions of styrene exceeded 2.5 tons per year, based upon a rolling, 12-month summation, and the actual emissions of styrene, based upon a rolling, 12-month summation, for each such month.

2. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total styrene emissions from the material employed in this emissions unit, in tons per year. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 pounds per hour of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1 of these terms and conditions.
 - b. Emissions Limitation:
40 pounds per day of OC emissions

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C. of these terms and conditions.
 - c. Emissions Limitation:
2.5 tons per year of styrene emissions, based upon a rolling 12-month summation

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.3 of these terms and conditions.
 - d. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).
 - e. Emission Limitation:
0.551 pounds per hour of particulate emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
2. Compliance with the limitations in Section B of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Styrene content of each resin employed shall not exceed 44% by weight

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.1.g of these terms and conditions.
 - b. Emission Limitation:
Resin usage from this emissions unit shall be limited to 270 gallons per month

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2 of these terms and conditions.
3. Formulation data or Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the styrene contents and OC contents of the lay-up materials and cleanup materials employed in this emissions unit.

F. Miscellaneous Requirements

1. The emissions from this emissions unit are prohibited from causing a nuisance, in violation of OAC rule 3745-15-07. If the Director determines that the emissions from this emissions unit are contributing to a nuisance, the permittee, upon notification by Ohio EPA, shall immediately undertake a program to reduce emissions or the impact of the emissions to achieve compliance with OAC rule 3745-15-07.
2. Pursuant to OAC rule 3745-35-07 (B)(2), the following terms and conditions are federally enforceable: sections A-F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for styrene (HAP) and, therefore, avoid Title V applicability.