

Facility ID: 0857713000 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0857713000 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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## Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

### 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>
P001 - fiberglass reinforced plastic molds and parts fabrication	OAC rule 3745-21-07(G)(2) PTI 08-04842  ORC 3704.03(T)(4)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day, including cleanup.  See Sections A.2.a below.

2. **Additional Terms and Conditions**
  - (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than ten tons per year taking into account the federally enforceable rule limit of 40 pounds per day under OAC rule 3745-21-07(G)(2).

### B. Operational Restrictions

1. None

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the emissions unit:
  - a. The company identification for each resin, gel coat and cleanup material employed.
  - b. The total number of gallons of each resin, gel coat and clean up material employed.
  - c. The organic compound content of each resin, gel coat and cleanup material employed, in pounds per gallon.
  - d. The method of application for each resin and gel coat employed.
  - e. The organic compound (%HAP) content of each resin and gel coat employed, in percent by weight.
  - f. The total daily organic compound emissions from all resins, gel coat, and cleanup materials, in pounds per day (see calculation methodology in Section E.1.b.).
  - g. The total number of hours the emissions unit was in operation.
  - h. The average hourly organic compound emission rate, in pounds per hour [i.e., (g)/(h)].
2. The permittee shall collect and record the following information for the purpose of determining annual organic compound emissions:
  - a. The company identification for each resin, gel coat, and cleanup material employed.
  - b. The total number of gallons of each resin, gel coat, and cleanup material employed.
  - c. The organic compound content of each resin, gel coat, and cleanup material employed, in pounds per gallon.
  - d. The total annual organic compound emission rate for all resin, gel coat, and cleanup material employed, in tons per year, determined by the summing the total daily organic compound emissions from C.1.f above for the calendar year and dividing by 2000 lb/ton.

3. The permit to install for this emissions unit P001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene  
 TLV (mg/m3): 170.40  
 Maximum Hourly Emission Rate (lbs/hr): 8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1775  
 MAGLC (ug/m3): 4057

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"); \
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**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 controlled organic compound emissions from the resins, gel coat and cleanup materials exceeded 8 pounds per hour, and the actual average hourly controlled organic compound emissions for each such day.
  - b. An identification of each day during which the controlled organic compound emissions from the resins, gel coat, and cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day. \

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 

Emission Limitation -  
 The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hr, including cleanup.

Applicable Compliance Method -  
 The hourly organic compound emission rate, in pounds per hour, shall be determined by monitoring and record keeping requirements of Section C.1.  
 The organic compound (OC) emissions from this emissions unit shall not exceed 40 lbs/day, including cleanup.

Applicable Compliance Method -  
 Compliance shall be determined as follows:

  - i. The daily usage rate for production resin (open molding operation, nonatomized mechanical application, nonvapor-suppressed resin), in pounds per day, recorded in Section C.1 shall be divided by 2000 pounds per ton. The usage rate of resin, in tons per day, shall then be multiplied by the emissions factor calculated using one of the following equations from 1.c.i in Table 1 of 40 CFR Part 63, Subpart WWWW:
    - a) for production resin material with less than 33% organic HAP use  
 $EF = 0.107 \times \%HAP \times 2000$ ;
    - b) for production resin material with 33% or more organic HAP use  
 $EF = [(0.157 \times \%HAP) - 0.0165] \times 2000$ .
  - ii. The daily usage rate for tooling resin (open molding operation, atomized mechanical application, nonvapor-suppressed resin), in pounds per day, recorded in Section C.1 shall be divided by 2000 pounds per ton. The usage rate of resin, in tons per day, shall then be multiplied by the emissions factor calculated using one of the following equations from 1.b.i in Table 1 of 40 CFR Part 63, Subpart WWWW:
    - a) for tooling resin material with less than 33% organic HAP use  
 $EF = 0.169 \times \%HAP \times 2000$ ;

b) for tooling resin material with 33% or more organic HAP use

$$EF = [(0.714 \times \%HAP) - 0.18] \times 2000.$$

iii. The daily usage rate for gel coat (open molding operation, nonatomized spray gel coat application, nonvapor-suppressed gel coat), in pounds per day, recorded in Section C.1 shall be divided by 2000 pounds per ton. The usage rate of gel coat, in tons per day, shall then be multiplied by the emissions factor calculated using one of the following equations from 1.g in Table 1 of 40 CFR Part 63, Subpart WWWW:

a) for gel coat material with less than 19% organic HAP use

$$EF = (0.185 \times \%HAP \times 2000);$$

b) for gel coat material with 19% or more organic HAP use

$$EF = 0 [(0.4506 \times \%HAP) 0.0505] \times 2000.$$

iv. The total daily usage of the cleanup material, gallons per day, recorded in Section C.1, shall be multiplied by the maximum organic compound content of the cleanup material, in pounds per gallon.

v. The total daily organic compound emission rate (in pounds per day) shall be the sum of the results from b.i, b.ii, b.iii, and b.iv above.

**F. Miscellaneous Requirements**

1. None