

Facility ID: 0868070055 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)

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Facility ID: 0868070055 Emissions Unit ID: K001 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>
K001 - Fiberglass resin spray booth (gel coat and mechanical non-atomized).	OAC rule 3745-31-05(A)(3) PTI 08-04524	The organic compound (OC) emissions from this emissions unit shall not exceed 2.02 lbs/hr and 16.16 lbs/day, excluding cleanup.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07 (B).  The annual OC emission rate shall not exceed 2.10 TPY, excluding cleanup, on a 12-month rolling basis.
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V Permitting	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) The 2.02 lb-OC/hr limitations was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations. Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are not required for this emissions unit.

**B. Operational Restrictions**

1. The resin use in this emissions unit shall not exceed 28.93 tons per year, based on a rolling 12-month summation.
2. The styrene in the resins applied in this emissions unit shall not exceed the following concentrations:
  - Resin - gel coat operations: 36% by weight
  - Resin - mechanical non-atomized spray up operations: 45% by weight

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

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
  - a. The name and identification for each material employed.
  - b. The total number of gallons of each resin and catalyst material employed.

- c. The organic compound content of each resin and catalyst material employed, in pounds per gallon.
  - d. The method of application for each resin employed.
  - e. The styrene content of each resin employed, in percent by weight.
  - f. The rolling, 12 month summation of the resin usage rates, in tons.
  - g. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
  - h. The total number of days the emissions unit was in operation.
  - i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))
2. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application, for K001, K002 and K003 combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (mg/m<sup>3</sup>): 170.40

Maximum Hourly Emission Rate (lbs/hr): 5.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1574

MAGLC (ug/m<sup>3</sup>): 1704

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled.
  - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
- a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 16.16 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. Each month that the 12 month rolling summation of resin usage exceeds 28.93 tons.
  - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 36% by weight when performing gel coat operations, or 45% by weight when performing spray up operations.
- The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

**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):
  - a. Emission Limitation -  
2.02 lbs/hour organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined as follows:
    - i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (260 lbs styrene per ton of resin when performing gel coat operations for resins with 36% styrene concentration by weight, or 108 lbs styrene per ton of resin when performing spray up operations for resins with 45% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
      - ii The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
    - iii. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i and ii above.
      - b. Emission Limitation -  
16.16 lbs/day organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:
        - i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (260 lbs styrene per ton of resin when performing gel coat operations for resins with 36% styrene concentration by weight, or 108 lbs styrene per ton of resin when performing spray up operations for resins with 45% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
          - ii The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
        - iii. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i and ii above, divided by the total number of days the emissions unit was in operation for the month.
  - c. Emission Limitation -  
2.10 TPY OC, including cleanup, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i - iii, and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 0868070055 Emissions Unit ID: K002 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>
K002 - Fiberglass resin spray booth (mechanical non-atomized with solvent flush) and cleanup operations.	OAC rule 3745-31-05(A)(3) PTI 08-04524	The organic compound (OC) emissions from this emissions unit shall not exceed 1.93 lbs/hr and 15.44 lbs/day, including cleanup.  The requirements of this rule also include compliance with the requirements of OAC 3745-35-07(B).  The annual OC emission rate shall not exceed 2.01 TPY, including cleanup, on a 12-month rolling basis.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(3).
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V Permitting	
	OAC 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) The 1.93 lb-OC/hr limitations was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations. Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are required for this emissions unit.

**B. Operational Restrictions**

1. The resin use in this emissions unit shall not exceed 30.88 tons per year, based on a rolling 12-month summation.
2. The styrene in the resins applied in this emissions unit shall not exceed 31% by weight.

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

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
  - a. The name and identification for each material employed.
  - b. The total number of gallons of each resin, catalyst and cleanup material employed.
  - c. The organic compound content of each resin, catalyst and cleanup material employed, in pounds per gallon.
  - d. The method of application for each resin employed.
  - e. The styrene content of each resin employed, in percent by weight.
  - f. The rolling, 12 month summation of the resin usage rates, in tons.
  - g. The total organic compound emissions from all resins, catalysts and cleanup employed, in pounds (see calculation methodology in Section E.1.b.).
  - h. The total number of days the emissions unit was in operation.
  - i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))
2. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application, for K001, K002 and K003 combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). 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): 5.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1574

MAGLC (ug/m3): 1704

Physical changes to or changes in the method of operation of the emissions unit after its installation or

modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled.
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 15.44 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. Each month that the 12 month rolling summation of resin usage exceeds 30.88 tons.
  - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

#### 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):
  - a. Emission Limitation -  
1.93 lbs/hour organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined as follows:
    - i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (66 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
      - ii The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
    - iii. The total usage of the cleanup material (gallons per hour) shall be multiplied by the maximum organic compound content of the cleanup material, in pounds per gallon.
    - iv. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i, ii and iii above.
      - b. Emission Limitation -  
15.44 lbs/day organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:
        - i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (66 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of

Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.

- ii The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
  - iii. The total usage of the cleanup material (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the cleanup material, in pounds per gallon.
  - iv. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i, ii and iii above, divided by the total number of days the emissions unit was in operation for the month.
- c. Emission Limitation -  
2.01 TPY OC, including cleanup, as a rolling 12-month summation
- Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i.- iv., and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

- 1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 0868070055 Emissions Unit ID: K003 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>
K003 - Fiberglass resin spray booth (mechanical atomized).	OAC rule 3745-31-05(A)(3) PTI 08-04524	The organic compound (OC) emissions from this emissions unit shall not exceed 1.29 lbs/hr and 10.31 lbs/day, excluding cleanup.  The requirements of this rule also include compliance with the requirements of OAC 3745-35-07(B).  The annual OC emission rate shall not exceed 1.34 TPY, excluding cleanup, on a 12-month rolling basis.
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V Permitting	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(3).
	OAC 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) The 1.29 lb-OC/hr limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations. Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are not required for this emissions unit.

**B. Operational Restrictions**

1. The resin use in this emissions unit shall not exceed 21.13 tons per year, based on a rolling 12-month summation.
2. The styrene in the resins applied in this emissions unit shall not exceed 31% by weight.

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

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
  - a. The name and identification for each material employed.
  - b. The total number of gallons of each resin and catalyst material employed.
  - c. The organic compound content of each resin and catalyst material employed, in pounds per gallon.
  - d. The method of application for each resin employed.
  - e. The styrene content of each resin employed, in percent by weight.
  - f. The rolling, 12 month summation of the resin usage rates, in tons.
  - g. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
  - h. The total number of days the emissions unit was in operation.
  - i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))
2. The permit to install for this emissions unit K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application, for K001, K002 and K003 combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). 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): 5.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1574

MAGLC (ug/m3): 1704

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled.
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 10.31 pounds per day, and the actual average daily organic compound emissions for each such day.
  - b. Each month that the 12 month rolling summation of resin usage exceeds 21.13 tons.
  - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

**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):
  - a. Emission Limitation -  
1.29 lbs/hour organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be determined as follows:
    - i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (105 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.  
  
ii The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
    - iii. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i and ii above.
  - b. Emission Limitation -  
10.31 lbs/day organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:
    - i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (105 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.  
  
ii The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
    - iii. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i. and ii above, divided by the total number of days the emissions unit was in operation for the month.
  - c. Emission Limitation -  
1.34 TPY OC, including cleanup, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i.- iii., and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.