



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 15-01575

Fac ID: 1576051933

DATE: 6/7/2005

Innovative Edge
John Stoffer
2720 Atlantic Blvd., N.E.
Canton, OH 44705

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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

Sincerely,

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

cc: USEPA

Canton LAA



Permit To Install
Terms and Conditions

Issue Date: 6/7/2005
Effective Date: 6/7/2005

FINAL PERMIT TO INSTALL 15-01575

Application Number: 15-01575
Facility ID: 1576051933
Permit Fee: **\$800**
Name of Facility: Innovative Edge
Person to Contact: John Stoffer
Address: 2720 Atlantic Blvd., N.E.
Canton, OH 44705

Location of proposed air contaminant source(s) [emissions unit(s)]:
2720 Atlantic Blvd., N.E.
Canton, Ohio

Description of proposed emissions unit(s):
New Paint Spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

Innovative Edge
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Issued: 6/7/2005

Facility ID: 1576051933

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	14.6

Innovative Edge
PTI Application: 15-01575
Issued: 6/7/2005

Facility ID: 1576051933

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Emissions of any single HAP (styrene, methyl methacrylate, xylene, dimethyl phthalate, methyl ethyl ketone, or any other HAP) shall not exceed 9.9 tons per year, as a rolling, 12-month summation from this facility. Emissions of any combination of HAPS shall not exceed 24.9 tons per year, as a rolling, 12-month summation from this facility.
2. The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for the Reinforced Plastic Composites Production MACT, 40 CFR Part 63, Subpart WWWW. If the rolling 12-month emission of Single HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production and any other applicable MACT standard, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting any Ohio EPA field office or at <http://www.epa.gov/ttn/atw/188polls.html>.
3. If emissions of any single HAP exceed 10 tons per year or if the total of multiple HAPS exceeds 25 tons per year, this facility becomes a major source for HAPS and becomes subject to all requirements of 40 CFR Part 60, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites.

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

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Gel coat application, an open molding process to apply non-vapor suppressed gel coat using atomized mechanical application to manufacture composite parts.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 7.3 tons per year from gel coat and clean-up materials. Also see A.2.b below.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.2.a below.
	OAC rule 3745-35-07 (B)	See A.2.c below.

2. Additional Terms and Conditions

- 2.a The gel coat contains a styrene-containing unsaturated polyester resin. Emissions of organic compounds from this emissions unit shall not exceed 8.0 pounds per hour and 40.0 pounds per day.
- 2.b The permittee shall not employ any cleanup material in this emissions unit which is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). Acetone is not a photochemically reactive material as defined in this rule.

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Innov:

PTI A

Issued: 6/7/2005

Emissions Unit ID: P001

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information daily for P001:
 - a. The name and identification number of each gel coat employed.
 - b. An identification of the type of application employed.
 - c. The amount of each gel coat employed.
 - d. The styrene content of each gel coat employed in per cent by weight.
 - e. The VOC content of each gel coat employed.
 - f. The total number of hours the emissions unit was in operation, in hours per day.
 - g. The total OC emission rate for all gel coats employed, calculated as the product of c and e.
 - h. The styrene emission rate calculated as shown in Part III, Section E.3.
 - i. The gel coat information shall be for the gel coats as employed, including any thinning solvents and/or other constituents added at the emissions unit.
2. The permittee shall collect and record the following information monthly for emissions units P001 and P002 combined:
 - a. The individual styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone emission rates for all gel coats and polyester resins employed in tons per year as a rolling, 12-month summation. Each new month constitutes a new rolling 12-month summation.
 - b. The sum of emissions of styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone for all gel coats and polyester resins employed, in tons per year as a rolling, 12-month summation. Each new month constitutes a new rolling 12-month summation.
3. The permittee shall collect and record the following information for each month for this emission unit:

Emissions Unit ID: P001

- a. The name and identification number of each cleanup material employed.
- b. Documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- c. The number of gallons of each cleanup material employed less material recovered, in gallons.
- d. The OC content of each cleanup material employed, in pounds of OC per gallon.
- e. The total OC emission rate for all cleanup materials employed, in tons, calculated as (c. x d.)/2000.

IV. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N, Canton, OH 44702-1544 in writing, identifying each day during which any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), was employed as cleanup material in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be a part of the quarterly reports specified in Part III, Section D.2. If no photochemically reactive cleanup material was used, a comment stating so shall be included in the relevant quarterly report.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:
 - a. Each day during which the total OC emissions exceeded 8.0 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - b. Each day during which the total OC emissions exceeded 40.0 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each month during which any of the individual rolling, 12-month summations for styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone emissions from emissions units P001 and P002 combined exceeded 9.9 tons. Report also the actual values of these individual 12-month rolling summations.
 - d. Each month during which the sum of the individual rolling, 12-month summations for styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone emissions from emissions units P001 and P002 combined exceeded 24.9 tons. Report also the actual value of this rolling, 12-month summation.

- e. For quarters having no deviations, a report stating so shall be submitted.
 - f. Quarterly reports are due to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue, North, Canton, OH 44702-1544 on the last day of the month following each quarter (e.g., on April 31st, July 31st, October 31st, and January 31st).
3. The permittee shall submit annual reports that identify:
- a. The total OC emissions from resins and cleanup materials from this emissions unit.
 - b. The total single HAP (styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone) emissions from emissions units P001 and P002 combined.
 - c. The report shall cover the calendar year and be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N, Canton, OH 44702-1544 and shall be submitted not later than January 31st of the following year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 pounds per hour of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.
 - b. Emission Limitation:
40 pounds per day of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.
 - c. Emission Limitation:
5.0 tons per year of OC emissions

Emissions Unit ID: P001

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C and shall be the summation of the 365 daily resin OC emissions rates for the calendar year divided by 2000, plus the total OC emissions from cleanup materials for the twelve months in the calendar year.

- d. **Emission Limitation:**
9.9 tons per year of any single HAP (styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone) emissions, as a rolling 12-month summation from P001 and P002 combined.

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.

- e. Emission Limitation:
24.9 tons per year of any combination of HAPS (styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone) emissions, as a rolling 12-month summation from P001 and P002 combined.

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.

2. Any determination of OC content, solids content, or density of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

3. Styrene emission rate = Tons of gel coat applied x EF

EF = $[(0.714 \times \% \text{HAP}) - 0.18] \times 2000$. EF is in units of lb of HAP emitted per ton of gel coat applied. % HAP is the weight percent of the HAP in the gel coat. Use this value in decimal form when calculating EF (e.g., 0.33 for 33% HAP content). This EF is from Table 1 of Subpart WWW of CFR 40 Part 63 using the emission factor for atomized mechanical resin application, nonvapor-suppressed resin for materials with 33 percent or more organic HAP.

VI. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.
2. Terms used in these Special Terms and Conditions which are from the reinforced Plastic Composites MACT, 40 CFR Part 63, Subpart WWW shall be defined as defined in this subpart.

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Innov:

PTI A

Issued: 6/7/2005

Emissions Unit ID: P001

B. State Only Enforceable Section

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Batch Mixing and Casting using polyester casting resin containing styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone.	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 7.3 tons per year from resin and clean-up materials. Also see A.2.b below.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.2.a below.
	OAC rule 3745-35-07 (B)	See A.2.c below.

2. Additional Terms and Conditions

- 2.a The emissions of organic compounds shall not exceed 8.0 pounds per hour and 40.0 pounds per day.
- 2.b The permittee shall not employ any cleanup material in this emissions unit which is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). Acetone is not a photochemically reactive material as defined in this rule.

II. Operational Restrictions

None.

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Innovative Edge
PTI Application: 15 01575
Issued

Facility ID: 1576051933

Emissions Unit ID: P002

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information daily for P002:
 - a. The name and identification number of each resin and catalyst employed.
 - b. An identification of the type of application employed.
 - c. The amount of each resin and catalyst employed.
 - d. The styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone contents of each resin and catalyst employed in percent by weight.
 - e. The OC content of each resin and catalyst employed.
 - f. The total number of hours the emissions unit was in operation, in hours per day.
 - g. The total OC emission rate for all resins and catalysts employed, calculated as the product of c and e.
 - h. The styrene emission rate calculated as shown in Part III, Section E.3.
 - h. The resin and catalyst information must be for the resins and catalysts as employed, including any thinning solvents and/or other constituents added at the emissions unit.
2. The permittee shall collect and record the following information monthly for emissions units P001 and P002 combined:
 - a. The individual styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone emission rates for all gel coats and polyester resins employed in tons per year as a rolling, 12-month summation. Each new month constitutes a new rolling 12-month summation.
 - b. The sum of emissions of styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone for all gel coats and polyester resins employed, in tons per year as a rolling, 12-month summation. Each new month constitutes a new rolling 12-month summation.
3. The permittee shall collect and record the following information for each month for this emission unit:

- a. The name and identification number of each cleanup material employed.
- b. Documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- c. The number of gallons of each cleanup material employed less material recovered, in gallons.
- d. The OC content of each cleanup material employed, in pounds of OC per gallon.
- e. The total OC emission rate for all cleanup materials employed, in tons, calculated as $(c. \times d.) / 2000$.

IV. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N, Canton, OH 44702-1544 in writing, identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed as cleanup material in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:
 - a. Each day during which the total OC emissions exceeded 8.0 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - b. Each day during which the total OC emissions exceeded 40.0 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each month during which any of the individual rolling, 12-month summations for styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone emissions from emissions units P001 and P002 combined exceeded 9.9 tons. Report also the actual values of these individual 12-month rolling summations.
 - d. Each month during which the sum of the individual rolling, 12-month summations for styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone emissions from emissions units P001 and P002 combined exceeded

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24.9 tons. Report also the actual value of this rolling, 12-month summation.

- e. For quarters having no deviations, a report stating so shall be submitted.
 - f. Quarterly reports are due to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue, North, Canton, OH 44702-1544 on the last day of the month following each quarter (e.g., on April 31st, July 31st, October 31st, and January 31st).
3. The permittee shall submit annual reports that identify:
- a. The total OC emissions from resins and cleanup materials from this emissions unit.
 - b. The total single HAP (styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone) emissions from emissions units P001 and P002 combined.
 - c. The report shall cover the calendar year and be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N, Canton, OH 44702-1544 and shall be submitted not later than January 31st of the following year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 pounds per hour of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.
 - b. Emission Limitation:
40 pounds per day of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.
 - c. Emission Limitation:
7.3 tons per year of OC emissions

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1 and C.3, and shall be the summation of the 365 daily resin and catalyst OC emissions rates for the calendar year divided by 2000, plus the total emissions from cleanup materials for the twelve months in the calendar year.

- d. Emission Limitation:
 9.9 tons per year of any individual HAP (styrene, methyl methacrylate, xylene, dimethyl phthalate, or methyl ethyl ketone) emissions, as a rolling 12-month summation from P001 and P002 combined.

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

- e. Emission Limitation:
 24.9 tons per year of any combination of HAPS (styrene, methyl methacrylate, xylene, dimethyl phthalate, and methyl ethyl ketone) emissions, as a rolling 12-month summation from P001 and P002 combined.

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.

2. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

3. HAP Emissions in tons = Tons of polyester casting used x EF

$$EF = (\text{fraction HAP \#1})(0.02) + (\text{fraction HAP \#2})(0.02) + \dots + (\text{fraction HAP \#n})(0.02)$$

Example: A casting resin contains 36% styrene and 6% methyl methacrylate. $EF = (0.36)(0.02) + (0.06)(0.02) = 0.0084$.

This emission factor is from AP-42, Table 4.4-2, for closed molding, Sept 1988.

VI. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.

2. Terms used in these Special Terms and Conditions which are from the reinforced Plastic Composites MACT, 40 CFR Part 63, Subpart WWWW shall be defined as defined in this subpart.

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Innov:

PTI A

Issued: 6/7/2005

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B. State Only Enforceable Section

None