Facility ID: 1431074177 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.

Facility ID: 1431074177 Emissions Unit ID: R001 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - Manual fiberglass line	OAC rule 3745-31-05(A)(3) (PTI 14-05690)	Organic compound (OC) emissions from this emissions unit shall not exceed 1.96 pounds per hour, 36.9 pounds per day and 6.73 tons per year. See sections B.1 through B.4.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the styrene and OC content, usage, and emission limitations established in this permit.

B. **Operational Restrictions**

1. The styrene and organic compound content of the resins employed in this emissions unit shall not exceed 33% by weight.

2. The styrene and organic compound content of the gel coats employed in this emissions unit shall not exceed 39% by weight.

3. The amount of resin employed in this emissions unit shall not exceed 32.49 pounds per hour, 714 pounds per day and 260,894 lbs/year.

4. The amount of gel coat employed in this emissions unit shall not exceed 10.33 pounds per hour, 124 pounds per day and 45,245 lbs/year.

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

1. The permittee shall collect and record the following information for each day for emissions unit R001.

   a. The company identification for each resin and gel coat employed.

   b. The number of pounds of each resin and gel coat employed.

   c. The percent styrene of each resin and gel coat employed in this emissions unit.

   d. The OC content of each resin and gel coat, in percent by weight.

   e. The total organic compound emission rate for all resins and gel coats, in pounds per day.

   f. The total number of hours the emissions unit was in operation.

   g. The average hourly organic compound emission rate for all resins and gel coats, in pounds per hour (e / f).

2. The permittee shall maintain annual records of the total OC emissions, in tons (summation of the emissions from term C.1.e divided by 2000 pounds per ton) and the total amounts of gel coating and resins employed (summation of the usages from term C.1.b).

3. The permit to install for this emissions unit R001 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. 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 Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: styrene
   TLV (ug/m3): 85,200
   Maximum Hourly Emission Rate (lbs/hr): 1.96
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):1946
   MAGLC (ug/m3): 2028
   Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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; 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.).
   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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. when the 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 deviation (excursion) reports which include the following information:

   a. An identification of each day during which the organic compound emissions from the resins and gel coats exceeded 1.96 pounds per hour and/or 36.9 pounds per day, and the actual organic compound emissions for each such day.

   b. An identification of each day during which the resin and or gel coat usage exceeded the usage limitations in terms and conditions B.3 or B.4, and the actual material usage for each such day.

   c. An identification of each day during which the styrene or organic compound content of the resin employed exceeded 33% by weight, and the actual styrene and organic compound content of the non-compliant resin employed.

   d. An identification of each day during which the styrene or organic compound content of the gel coat employed exceeded 39% by weight, and the actual styrene and organic compound content of the non-compliant gel coat employed.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports which identify the amount of resins and gel coats used in pounds for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   Organic compound (OC) emissions from this emissions unit shall not exceed 1.96 pounds per hour.

   Applicable Compliance Method:
   The hourly OC emission rate is based on the emission unit's hourly potential to emit. The potential to emit was calculated using the following equation: {(32.49 pounds of resin employed per hour) x (82.96 pounds styrene per 2000 pounds of resin)} + {(10.33 pounds of gel coat employed per hour) x (117.28 pounds styrene per 2000

pounds of gel coat)}. It is assumed OC is comprised of only styrene for the resins and gel coats.

b. Emission Limitation:
Organic compound (OC) emissions from this emissions unit shall not exceed 36.9 lbs/day.

Applicable Compliance Method:
Compliance with the daily OC emission limitation in section A.1 shall be based upon the record keeping requirements as specified in Section C.1. The emission limitation was calculated using the following equation:
{(714 pounds of resin employed per day) x (82.96 pounds styrene per 2000 pounds of resin) x (1 ton/2000 pounds)} + {(124 pounds of gel coat employed per day) x (117.28 pounds styrene per 2000 pounds of gel coat) x (1 ton/2000 pounds)}.

c. Emission Limitation:
6.73 TPY of OC

Applicable Compliance Limitation:
Compliance with the annual OC emission limitation in term A.1 shall be based upon the record keeping requirements as specified in Section C.2. The emission limitation was calculated using the following equation:
{(260,894 pounds of resin employed per year) x (82.96 pounds styrene per 2000 pounds of resin) x (1 ton/2000 pounds)} + {(45,245 pounds of gel coat employed per year) x (117.28 pounds styrene per 2000 pounds of gel coat) x (1 ton/2000 pounds)}.
d. Emission Limitation:
Styrene content of 33% for resins and 39% for gel coats

Applicable Compliance Method:
Compliance with the styrene content limit for the resins and gel coats in sections B.1 and B.2 of this permit shall be based on the manufacturer's formulation data and demonstrated by the record keeping in section C.1.

e. Emission Limitation:
OC content of 33% for resins and 39% for gel coats

Applicable Compliance Method:
Compliance with the OC content limit for the resins and gel coats in sections B.1 and B.2 of this permit shall be based on the manufacturer's formulation data and demonstrated by the record keeping in section C.1.
f. Usage Limitations:
Resin usage rate not to exceed 32.49 pounds per hour, 714 pounds per day and 260,894 lbs/year.

Gel coat usage rate not to exceed 10.33 pounds per hour, 124 pounds per day and 45,245 lbs/year.

Applicable Compliance Method:
Compliance with the resin and gel coat usage limitations in sections B.3 and B.4 of this permit shall be demonstrated by the record keeping in sections C.1 and C.2.

F. **Miscellaneous Requirements**

1. None