

Facility ID: 1431273332 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.

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

Facility ID: 1431273332 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gel coat spray booth A	OAC rule 3745-31-05(A)(3) (PTI 14-04749)	8.0 lbs/hr of organic compound (OC) emissions from coatings 40 lbs/day of OC emissions from coatings 3.7 tons per year (TPY) of OC emissions from coatings
	OAC rule 3745-31-05(D) (PTI 14-04749)	3.27 lbs/day of OC emissions from cleanup materials 0.60 TPY of OC emissions from cleanup materials See Section A.2 below.
	OAC rule 3745-21-07(G)(2)	The hourly and daily OC emission limitations specified by this rule are the same as the daily and hourly OC emission limitations established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**
 - (a) The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above emission limitations shall be based on a rolling, 12-month summation.

B. Operational Restrictions

1. The amount of cleanup material employed shall not exceed 0.5 gallon/day and 182.5 gallons/year.
2. The amount of gel coat employed shall not exceed 3.1 gallons/hour, 15.49 gallons/day and 3,040 gallons/year. The gallons/year limit is based upon a rolling, 12-month summation.
3. The OC content (styrene) of the gel coat employed shall not exceed 48%, by weight.
4. The permittee shall employ only nonphotochemically reactive cleanup materials in this emissions unit.
5. The permittee shall employ cleanup materials that have a maximum density not to exceed 6.54 pounds of OC per gallon, as applied.
6. This emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emission control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating employed;
 - b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

- c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating $\times (0.01036 \times (C.2.d) - 0.195) \times (0.73, \text{ if controlled spray methods are used, or } 1.0, \text{ if controlled spray methods are not used})$, plus the sum of (f) times (h) for each cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];
- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating $\times (0.01036 \times (C.2.d) - 0.195) \times (0.73, \text{ if controlled spray methods are used, or } 1.0, \text{ if controlled spray methods are not used})$, plus the sum of (g) times (h) for each cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];
- k. the updated rolling, 12-month summation for individual HAP emissions for each HAP, in tons (This shall include the information for the current month and the preceding eleven calendar months.); and
- l. the updated rolling, 12-month summation for total combined HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating material employed;
 - c. the density of each gel coat, as applied, in pounds per gallon;
 - d. the OC content (i.e., percent styrene by weight) of each coating employed in this emissions unit;
 - e. the number of gallons of each cleanup material employed;
 - f. the OC content of each cleanup material, in pounds per gallon;
 - g. the total OC emission rate for all coatings employed, in pounds per day [summation of (b \times c) for all coatings employed $\times (0.01036 \times (d) - 0.195) \times (0.73, \text{ if controlled spray methods are used, or } 1.0, \text{ if controlled spray methods are not used})$];
 - h. the total OC emission rate for all cleanup materials employed, in pounds per day [summation of (e \times f) for all cleanup materials employed];
 - i. the total number of gallons of all coatings employed [summation of (b) for all coatings employed each day];
 - j. the total number of gallons of all cleanup material employed [summation of (e) for all cleanup materials employed each day];
 - k. the total number of hours the emissions unit was in operation;
 - l. the average hourly OC emission rate for all coatings, in pounds per hour (g/k);
 - m. the average hourly coating usage, in gallons per hour (i/k); and
 - n. documentation on whether each cleanup material is a photochemically reactive material.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).
3. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of coatings employed (summation of C.2.i for each day of the calendar month);
 - b. the rolling, 12-month summation of the monthly coating usage rates, in gallons; and
 - c. the total number of gallons of cleanup material employed (summation of C.2.j for each day of the calendar month).
4. The permittee shall maintain annual records of the total number of gallons of cleanup material employed (summation of C.3.c for each month of the calendar year).
5. The permit to install for this emissions unit 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. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics 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:

Pollutant: Styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 16

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1.907

MAGLC (ug/m3): 2,024

Physical changes to or 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 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxics 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 Toxics Policy" will be satisfied with the above changes, 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.

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 Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the coatings exceeded 8.0 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. An identification of each day when OC emissions from cleanup materials exceeded 3.27 pounds per day, and the actual OC emissions for each such day; and
 - d. An identification of all exceedances of the rolling, 12-month HAP emission limitations of 9.9 tons and 24.9 tons for any single HAP and combination of HAPs, respectively.

All quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing the use of noncomplying coatings or cleanup materials (i.e., OC content or percent styrene content) or exceedances of the hourly, daily, or rolling, 12-month summation of any coating and cleanup material usage limitations. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the occurrence.
4. The permittee shall submit annual reports that specify the total amount, in gallons, of coatings and cleanup materials used and the HAP emissions, in tons, for the previous calendar year. These reports shall be

submitted by January 30 of each year.

E. Testing Requirements

1. Compliance with the OC emission limitations, HAP emission limitations, coating and cleanup material usage restrictions, OC content restriction for cleanup materials and the styrene content limitation for the gel coat shall be determined in accordance with the following methods:
OC Emission Limitations: 8 lbs of OC emissions/hour from coatings; 40 lbs of OC emissions/day from coatings; 3.7 TPY of OC emissions from coatings

Applicable Compliance Method: The OC emissions are determined by using the following equations:

lbs/hour of OC emissions = (lbs of gel coat applied/hour) x (emission factor)*

lbs/day of OC emissions = (lbs of gel coat applied/day) x (emission factor)*

lbs/year of OC emissions = (lbs of gel coat applied/year) x (emission factor)*

* Emission factors were established using the following formula from the Composites Fabricators Association Open Molding Emission Model, dated May 1998:

Emission Factor = Base Emission Factor x Controlled Spray Factor

Base Emission Factor = [(0.01036 x % styrene) - 0.195]

Controlled Spray Factor = 0.73 if controlled spray methods are used and 1.0 if controlled spray methods are not used

Compliance with the hourly and daily OC emission limitations from coatings shall be determined by the record keeping specified in Section C.2. Compliance with the annual OC emission limitation from coatings is ensured if compliance is maintained with the annual gel coat usage restriction and the styrene content restriction for the gel coat.

OC Emission Limitations: 3.27 lbs of OC emissions/day from cleanup materials; 0.60 TPY of OC emissions from cleanup materials

Applicable Compliance Method: Compliance with the daily OC emission limitation for cleanup materials shall be determined by the record keeping requirements specified in Section C.2. Compliance with the annual OC emission limitation for cleanup materials is ensured if compliance is maintained with the annual cleanup material usage restriction and the cleanup material OC content limitation.

HAP Emission Limitations: not to exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs

Applicable Compliance Method: Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in Section C.1.

Coating Material Usage Restrictions: 3.1 gallons of gel coat/hour; 15.49 lbs of gel coat/day; 3,040 lbs of gel coat/year (as a rolling, 12-month summation)

Applicable Compliance Method: Compliance with the hourly, daily and annual coating material usage restrictions shall be determined by the record keeping requirements specified in Sections C.2 and C.3.

Cleanup Material Usage Restrictions: 0.5 gallon/day; 182.5 gallons/year

Applicable Compliance Method: Compliance with the daily and annual cleanup material usage restrictions shall be determined by the record keeping requirements specified in Sections C.2 and C.4, respectively.

OC Content Limitation: 6.54 lbs of OC/gallon for cleanup materials

Applicable Compliance Method: Compliance with the OC content limitation shall be determined by the record keeping requirements specified in Section C.2.

Styrene Content Limitation: not to exceed 48% by weight

Applicable Compliance Method: Compliance with the styrene content limitation shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. None