

Facility ID: 1483040411 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: 1483040411 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>
R001-gel coat spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-05084)	Organic Compound (OC) emissions shall not exceed 5.0 tons per year, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B)(1). See term A.2.a.
	OAC rule 3745-35-07(B)(1) Synthetic Minor to avoid MACT and Title V	
	OAC rule 3745-21-07(G)(2)	Organic Compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day, including OC emissions from cleanup.

2. Additional Terms and Conditions

- (a) The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from P001 (Marble Casting) and R001(Gel Coat Spray Booth), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee has existing records to demonstrate compliance upon issuance of the permit. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.

B. Operational Restrictions

1. The styrene content in the gel coat used shall not exceed 47 percent by weight.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each Hazardous Air Pollutant (HAP)* containing material employed;
 - b. The amount of each HAP containing material employed, in pounds;
 - c. The total individual HAP emissions for each HAP from all HAP containing materials employed, in pounds or tons per month. (This shall be calculated by using the appropriate emissions factor for each individual HAP for each HAP containing material);
 - d. The total combined HAP emissions from all HAP containing material employed, in pounds or tons per month. [This shall be calculated by adding the emissions from (c) for each individual HAP emitted];
 - e. The updated rolling, 12-month summation for each individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,

f. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or 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 for each day for emissions unit R001:

a. The amount of gel coat used, in pounds;

b. The styrene content, in percent by weight;

c. The amount of cleanup material used, in pounds;

d. The daily OC emissions, in pounds, calculated using the following equation:

OC emission = (pounds of gelcoat used) (the appropriate emissions factor*) + (pounds of cleanup material used**)

e. The total number of hours per day the emissions unit was in operation.

f. The average hourly OC emissions, in pounds per hour, calculated by dividing (d) by (e).

g. The annual OC emissions, in tons per year, calculated by summing the daily OC emissions calculated in (d) above and then dividing the result by 2000.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

* The emission factors are from the Composites Fabricators Association Open Molding Emissions Model, Dated 5/98.

** Assumes that all cleanup material employed is evaporated.

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): 8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 201.7
 MAGLC (ug/m3): 2029

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

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) meet(s) the definition of a "modification" under other provisions of the rule, 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 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

- 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.a. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of the permit.

E. Testing Requirements

1. Compliance with the HAPs emission limitations in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.1.
2. Compliance with the OC emissions limitation in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.2.
3. Compliance with the styrene content limitation in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B.1, C.1 - C.2, D and E.