

Facility ID: 1576001779 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: 1576001779 Emissions Unit ID: P001 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>
P001 - Resin mix	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from the use of resin mix shall not exceed 0.4 lb/hr. The OC emissions from the use of cleanup material shall not exceed 5.3 lbs/hr. The OC emissions from the use of cleanup shall not exceed 5.3 tons/yr as a rolling, 12-month, summation. The OC emissions from the use of resin mix shall not exceed 0.4 ton/yr as a 12-month, rolling summation. See sections A.2.a, B.1, B.2, B.3, B.4, B.5, B.6 and B.7 below.
	OAC rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- (a) The styrene content of the resin used in emissions unit P001 shall not exceed 33% by weight.

B. Operational Restrictions

1. Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.
2. The maximum annual acetone usage for this emissions unit shall not exceed 1,591 gallons per year based upon a rolling, 12-month summation of the acetone usage rates. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage rate specified in the following table:

Maximum Allowable Cumulative
Month(s) Gallons of Acetone Usage

- 1 140
- 1-2 280
- 1-3 420
- 1-4 560
- 1-5 700
- 1-6 840
- 1-7 980
- 1-8 1120
- 1-9 1260
- 1-10 1400
- 1-11 1540

1-12 1591

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual acetone usage rate shall be based upon a rolling, 12-month summation of the acetone usage rate.

3. The maximum annual resin usage for this emissions unit shall not exceed 80,800 pounds per year based upon a rolling, 12-month summation of the usage rates. To ensure enforceability during the 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the resin usage rate specified in the following table:

Maximum Allowable Cumulative
Month(s) Pounds of Resin Usage

1 7,000
1-2 14,000
1-3 21,000
1-4 28,000
1-5 35,000
1-6 42,000
1-7 49,000
1-8 56,000
1-9 63,000
1-10 70,000
1-11 77,000
1-12 80,800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the resin usage limitation for this emissions unit shall be based upon a rolling, 12-month summation of the resin usage rates.

4. During the transfer of raw materials, such as the vinyl ester resin, to the mixer, the raw material containers shall be kept closed. The exact amount of raw materials should be pumped or siphoned. During the transfer of the finished mixture to the molding press, the lid on the transfer container must be closed.
5. The mixer shall be cleaned with less than six gallons of acetone. The exact amount of acetone shall be placed in the mixer, the mixer closed and the mixer shall be run for about 10 minutes. All mixing containers, except the mixer, such as buckets, etc. shall be hand rinsed with minimal amounts of acetone. The containers for the new acetone shall be left closed after the acetone is removed from them. Used acetone shall be recovered using the facility's closed acetone recovery still.
6. The mixing room shall be kept clean of all materials containing organic compounds on a daily basis, at the end of the first shift on days when the mixing room is utilized.
7. The permittee shall employ cleanup materials in emissions unit P001 which have a maximum OC content of 6.62 pounds of OC per gallon, as applied.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P001:
- the company identification for each resin and cleanup material employed;
 - the number of gallons of each resin material employed.;
 - the percent styrene of each resin employed in this emissions unit;
 - the number of gallons of cleanup material employed;
 - the organic compound content of the cleanup material, in pounds per gallon;
 - the organic compound emission rate for all resins, in pounds per day;
 - the organic compound emission rate for cleanup material, in pounds per day;
 - the total number of hours the emissions unit was in operation;
 - the average hourly organic compound emission rate for all resin, in pounds per hour (f/h);
 - the average hourly organic compound emission rate for all cleanup material, in pounds per hour (g/h); and
 - 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 definitions of "nonphotochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain monthly records of the following information:
- the amount, in pounds, of each resin employed; and
 - the rolling, 12-month summation of the production rates.
3. The permittee shall maintain monthly records of the following information:
- the amount, in gallons, of each cleanup material employed; and
 - the rolling, 12-month summation of the production rates.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P001:
 - a. an identification of each day during which the average hourly organic compound emissions from the resins exceeded 0.4 pound per hour, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the cleanup material exceeded 5.3 pounds per hour;
 - c. all exceedances of the rolling, 12-month resin usage limitation; and
 - d. all exceedances of the rolling, 12-month acetone usage limitations.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Canton local air agency in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.

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):

Emissions Limitation:
The organic compound (OC) emissions from the use of resin mix shall not exceed 0.4 lb/hr.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.1.

Emissions Limitation:
The organic compound (OC) emissions from the use of cleanup material shall not exceed 5.3 lbs/hr.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.1.

Emissions Limitation:
The OC emissions from the use of cleanup shall not exceed 5.3 tons/yr as a 12-month, rolling summation.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.3.

Emissions Limitation:
The OC emissions from the use of resin shall not exceed 0.4 ton/yr as a 12-month, rolling summation.

Applicable Compliance Method
Monitoring and record keeping as required in section C.2.

Emissions Limitation:
The OC emissions from the use of cleanup shall not exceed 5.3 tons/yr as a 12-month, rolling summation.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.3.
2. Compliance with the operational limitations in sections A.2.a and B of these terms and conditions shall be determined in accordance with the following methods:

Operational Limitation:
The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 33 percent styrene, by weight.

Applicable Compliance Method:
The OC content shall be determined using Method 24 or 24A from 40 CFR Part 60, Appendix A.

Operational Limitation:
Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.1.

Operational Limitation:
The maximum annual resin usage for this emissions unit shall not exceed 80,800 pounds per year based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.2.

Operational Limitation:
The maximum annual acetone usage for this emissions unit shall not exceed 1,591 gallons per year based upon a rolling, 12-month summation of the acetone usage rates.

Applicable Compliance Method:
Monitoring and record keeping as required in section C.3.

F. Miscellaneous Requirements

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