

Facility ID: 1576011516 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.

- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P002](#)
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Facility ID: 1576011516 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>
Spray Lay-up Booth #1	OAC rule 3745-31-05(A)(3) PTI 15-250	No allowables
	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of OC (due to resin usage only)

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. Acetone, a non-photochemically reactive material, shall be the only material used for cleanup operations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each hour for P001:
 - a. the company identification of each resin employed;
 - b. the amount, in pounds, of each resin employed;
 - c. the organic compound content, in percent by weight, of each resin employed; and
 - d. the organic compound emission rate for all resins employed, in pounds per hour, for each hour of the day.
2. The permittee shall collect and record the following information each day for P001:
 - a. the company identification of each resin employed;
 - b. the amount, in pounds, of each resin employed;
 - c. the organic compound content, in percent by weight, of each resin employed; and
 - d. the organic compound emission rate for all resins employed, in pounds per day.
3. For further information regarding records retention requirements, see General Terms and Conditions Part I.4.

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 resins exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour for P001 only.
 - b. An identification of each day during which the organic compound emissions from the resins exceeded 40 pounds per day, and the actual organic compound emissions for each such day for P001 only.

- 2. For further information regarding the reporting requirements, see General Terms and Conditions Part I.3.
- 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
8 lbs/hour OC due to resin usage only
 - Applicable Compliance Method -
Maintain hourly records of the amount of resins (in pounds) employed. Calculate the hourly emissions based on the corresponding OC contents (% by weight) of each resin and the use of the Unified Emission Factors for Open Molding of Composites. Submit exceedance reports if warranted.
 - Emissions Limitation
40 lbs/day OC due to resin usage only
 - Applicable Compliance Method -
Maintain daily records of the amount of resins (in pounds) employed. Calculate the daily emissions based on the corresponding OC contents (% by weight) of each resin and the use of the Unified Emission Factors for Open Molding of Composites. Submit exceedance reports if warranted.
- F. **Miscellaneous Requirements**
 - 1. None

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Facility ID: 1576011516 Emissions Unit ID: P002 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>
Spray Lay-up Booth #2	OAC rule 3745-31-05(A)(3) PTI 15-250	No allowables
	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of OC (due to resin usage only)

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. Acetone, a non-photochemically reactive material, shall be the only material used for cleanup operations.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each hour for P002:
 - a. the company identification of each resin employed;
 - b. the amount, in pounds, of each resin employed;
 - c. the organic compound content, in percent by weight, of each resin employed; and
 - d. the organic compound emission rate for all resins employed, in pounds per hour, for each hour of the day.
- 2. The permittee shall collect and record the following information each day for P002:
 - a. the company identification of each resin employed;
 - b. the amount, in pounds, of each resin employed;

- c. the organic compound content, in percent by weight, of each resin employed; and
 - d. the organic compound emission rate for all resins employed, in pounds per day.
- 3. For further information regarding records retention requirements, see General Terms and Conditions Part I.4.

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 resins exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour for P002 only.
 - b. An identification of each day during which the organic compound emissions from the resins exceeded 40 pounds per day, and the actual organic compound emissions for each such day for P002 only.
- 2. For further information regarding the reporting requirements, see General Terms and Conditions Part I.3.

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
8 lbs/hour OC due to resin usage only
 - Applicable Compliance Method -
Maintain hourly records of the amount of resins (in pounds) employed. Calculate the hourly emissions based on the corresponding OC contents (% by weight) of each resin and the use of the Unified Emission Factors for Open Molding of Composites. Submit exceedance reports if warranted.
 - Emissions Limitation
40 lbs/day OC due to resin usage only
 - Applicable Compliance Method -
Maintain daily records of the amount of resins (in pounds) employed. Calculate the daily emissions based on the corresponding OC contents (% by weight) of each resin and the use of the emissions factor (EF) from the Unified Emission Factors for Open Molding of Composites. Submit exceedance reports if warranted.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1576011516 Emissions Unit ID: P003 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>
P003 - Hand lay-up operation	OAC rule 3745-31-05(A)(3) PTI 15-01467 Modification 5/14/02	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month. The OC emissions from the use of resin shall not exceed 2.36 lbs/hr. The OC emissions from the use of resin shall not exceed 1 ton/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the

requirements of OAC rule 3745-21-07(G)(2).

See A.2.a, B.1, and B.2 below.

OAC rule 3745-21-07(G)(2)

OC emissions shall not exceed 40 lbs/day (due to resin usage only). See A.2.b

2. Additional Terms and Conditions

- (a) BAT shall be the use of low styrene, non-vapor suppressed resins (31% styrene content) and compliance with OAC rule 3745-21-07(G)(2).
The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the resins employed in this emissions unit shall not exceed 31 percent styrene, by weight.
2. 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.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P003:
 - a. The company identification of each resin employed;
 - b. The amount, in pounds, of each resin employed;
 - c. The organic compound content, in percent by weight, of each resin employed; and
 - d. The organic compound emission rate for all resins employed, in pounds per hour, for each hour of the day.
2. The permittee shall collect and record the following information each day for emissions unit P003:
 - a. The company identification of each resin employed;
 - b. The amount, in pounds, of each resin employed;
 - c. The organic compound content, in percent by weight, of each resin employed;
 - d. The total organic compound emission rate for all resins, in pounds per day; and
 - e. The total combined rolling, 365-day summation of the total organic compound emission rate for all resins, in pounds per year and tons per year.
3. The permittee shall collect and record the following information each day for emissions unit P003:
 - a. The company identification of each resin employed;
 - b. The amount, in pounds, of each resin employed;
 - c. The organic compound content, in percent by weight, of each resin employed;
 - d. The total organic compound emission rate for all resins, in pounds per day; and
 - e. The total combined rolling, 365-day summation of the total organic compound emission rate for all resins, in pounds per year and tons per year.

4. For further information regarding records retention requirements, see General Terms and Conditions Part I.4.

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 use of resins exceeded 2.36 pounds per hour and the actual organic compound emissions for each such hour for P003 only; and
 - b. An identification of each day during which the organic compound emissions from the use of resins exceeded 40 pounds per day and the actual organic compound emissions for each such day for P003 only.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all resins.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.2 ton OC/month from the use of cleanup material.
4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying resins (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.
5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. 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.

6. For further information regarding reporting requirements, see General Terms and Condition.

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

OC emissions shall not exceed 2.36 lbs/hour (due to resin usage only).

Applicable Compliance Method

Maintain hourly records of the amount of resins (in pounds) employed. Calculate the hourly emissions based on the amount (lbs/hr) of each resin employed and the use of the Unified Emission Factors (UEF) for Open Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors were recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of resin employed. Since the styrene content of the resin is 31%, the UEF emission factor is determined from the following formula:

$$E.F. = 0.126 \times \% \text{ styrene} \times 2000 = 0.126 \times 0.31 \times 2000 = 78.12 \text{ lbs styrene/ton resin}$$

Therefore, the hourly emission rate is calculated as follows:

$$78.12 \text{ lbs styrene/ton resin} \times \text{lbs resin/hour} \times \text{ton/2000 lbs} = \text{lbs styrene/hour}$$

Emissions Limitation

OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method

Maintain daily records of the amount of resins (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each resin employed and the use of the UEF emission factor of 78.12 lbs styrene/ton resin as noted above. The daily emission rate is calculated as follows:

$$78.12 \text{ lbs styrene/ton resin} \times \text{lbs resin/day} \times \text{ton/2000 lbs} = \text{lbs styrene/day}$$

Emissions Limitation

The OC emissions from the use of resin shall not exceed 1 ton/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method

Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P003. The total rolling, 365-day OC emissions shall be determined by the following procedure:

$$\text{Total daily emissions} = P003$$

where, the emission unit identification represents the lbs OC per day per unit.

$$\text{rolling, 365-day emissions} = \text{Day 1} + \text{Day 2} + \dots + \text{Day 365}$$

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

$$\text{rolling, 365-day emissions} = \text{Day 2} + \text{Day 3} + \dots + \text{Day 365} + \text{Day 366}$$

$$\text{rolling, 365-day emissions} = \text{Day 3} + \text{Day 4} + \dots + \text{Day 366} + \text{Day 367}$$

Emissions Limitation

The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month.

Applicable Compliance Method

Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section B of these terms and conditions shall be determined in accordance with the following methods:

Operational Limitation

The maximum styrene content of the resins employed in this emissions unit shall not exceed 31 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

The maximum styrene content of the resins employed in this emissions unit shall not exceed 31 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.

F. Miscellaneous Requirements

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

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Facility ID: 1576011516 Emissions Unit ID: P004 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>
P004 - Finish Gel Coat Booth	OAC rule 3745-31-05(A)(3) PTI 15-01467 Modification 5/14/02	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month. The OC emissions from the use of gel coat shall not exceed 5 lbs/hr. The OC emissions from the use of gel coat shall not exceed 2 tons/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2). See A.2.a, B.1, and B.2 below. OC emissions shall not exceed 40 lbs/day (due to gel coat usage only). See A.2.b.
	OAC rule 3745-21-07(G)(2)	

2. **Additional Terms and Conditions**
 - (a) BAT shall be the use of low styrene, gelcoats (29.5% styrene content), use of a controlled spray program to minimize overspray of gelcoats, and compliance with OAC rule 3745-21-07(G)(2). The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.
2. 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.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P004:
 - a. The company identification of each gel coat employed;
 - b. The amount, in pounds, of each gel coat employed;
 - c. The organic compound content, in percent by weight, of each gel coat employed; and
 - d. The organic compound emission rate for all gel coats employed, in pounds per hour, for each hour of the day.
2. The permittee shall collect and record the following information each day for emissions unit P004:
 - a. The company identification of each gel coat employed;
 - b. The amount, in pounds, of each gel coat employed;
 - c. The organic compound content, in percent by weight, of each gel coat employed;
 - d. The total organic compound emission rate for all gel coats, in pounds per day; and
 - e. The total combined rolling, 365-day summation of the total organic compound emission rate for all gel coats, in

pounds per year and tons per year.

3. The permittee shall collect and record the following information each month for emissions unit P004:
 - a. The company identification for each cleanup material employed; and
 - b. The amount, in pounds, of each cleanup material employed.

4. For further information regarding records retention requirements, see General Terms and Conditions.

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 use of resins exceeded 5 pounds per hour and the actual organic compound emissions for each such hour for P004 only; and
 - b. An identification of each day during which the organic compound emissions from the use of gel coats exceeded 40 pounds per day and the actual organic compound emissions for each such day for P004 only.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all gel coats.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.2 ton OC/month from the use of cleanup material.
4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying resins (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.
5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. 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.
6. For further information regarding reporting requirements, see General Terms and Conditions.

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
OC emissions shall not exceed 5 lbs/hour (due to gel coat usage only).

Applicable Compliance Method

Maintain hourly records of the amount, in pounds, of gel coats employed. Calculate the hourly emissions based on the amount (lbs/hr) of each gel coat employed and the use of the Unified Emission Factors (UEF) for Open Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors were recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of gel coat employed. Since the styrene content of the gel coat is 29.5%, the UEF emission factor is determined from the following formula:

$$E.F. = 0.325 \times \% \text{ styrene} \times 2000 = 0.325 \times 0.295 \times 2000 = 191.75 \text{ lbs styrene/ton gel coat}$$

Therefore, the hourly emission rate is calculated as follows:

$$191.75 \text{ lbs styrene/ton gel coat} \times \text{lbs gel coat/hour} \times \text{ton/2000 lbs} = \text{lbs styrene/hour}$$

Emission Limitation -

Emissions Limitation

OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method

Maintain daily records of the amount of gel coats (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each gel coat employed and the use of the UEF emission factor of 191.75 lbs styrene/ton gel coat as noted above. The daily emission rate is calculated as follows:

$$191.75 \text{ lbs styrene/ton gel coat} \times \text{lbs resin/day} \times \text{ton/2000 lbs} = \text{lbs styrene/day}$$

Emissions Limitation

The OC emissions from the use of resin shall not exceed 2 tons/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method

Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P004. The total rolling, 365-day OC emissions shall be determined by the following procedure:

$$\text{Total daily emissions} = P004$$

where, the emission unit identification represents the lbs OC per day per unit.

$$\text{rolling, 365-day emissions} = \text{Day 1} + \text{Day 2} + \dots + \text{Day 365}$$

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

rolling, 365-day emissions = Day 2 + Day 3 + ... + Day 365 + Day 366

rolling, 365-day emissions = Day 3 + Day 4 + ... + Day 366 + Day 367

Emissions Limitation

The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month.

Applicable Compliance Method

Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section 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 29.5 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.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.

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Facility ID: 1576011516 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate

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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>
P005 - Set up gel coat booth	OAC rule 3745-31-05(A)(3) PTI 15-01467 Modification 5/14/02	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.1 ton/month. The OC emissions from the use of gel coat shall not exceed 7.5 lbs/hr. The OC emissions from the use of gel coats shall not exceed 3 tons/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See A.2.a, B.1, and B.2 below. OC emissions shall not exceed 40 lbs/day (due to gel coat usage only). See A.2.b.

2. Additional Terms and Conditions

- (a) BAT shall be the use of low styrene gelcoats (29.5% styrene content), use of a controlled spray program to minimize overspray of gelcoats, and compliance with OAC rule 3745-21-07(G)(2). The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.
2. 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.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P005:
 - a. The company identification of each gel coat employed;
 - b. The amount, in pounds, of each gel coat employed;
 - c. The organic compound content, in percent by weight, of each gel coat employed; and
 - d. The organic compound emission rate for all gel coats employed, in pounds per hour, for each hour of the day.
2. The permittee shall collect and record the following information each day for emissions unit P005:
 - a. The company identification of each gel coat employed;
 - b. The amount, in pounds, of each gel coat employed;
 - c. The organic compound content, in percent by weight, of each gel coat employed;
 - d. The total organic compound emission rate for all gel coats, in pounds per day; and
 - e. The total combined rolling, 365-day summation of the total organic compound emission rate for all resins, in pounds per year and tons per year.
3. The permittee shall collect and record the following information each month for emissions unit P005:
 - a. The company identification for each cleanup material employed; and
 - b. The amount, in pounds, of each cleanup material employed.
4. For further information regarding records retention requirements, see General Terms and Conditions.

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 use of resins exceeded 7.5 pounds per hour and the actual organic compound emissions for each such hour for P005 only; and
 - b. An identification of each day during which the organic compound emissions from the use of resins exceeded 40 pounds per day and the actual organic compound emissions for each such day for P005 only.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all gel coats.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.1 ton OC/month from the use of cleanup material.
4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying gel coats (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.
5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. 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.
6. For further information regarding reporting requirements, see General Terms and Conditions.

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
OC emissions shall not exceed 7.5 lbs/hour (due to gel coat usage only).

Applicable Compliance Method
Maintain hourly records of the amount, in pounds, of gel coats employed. Calculate the hourly emissions based on the amount (lbs/hr) of each gel coat employed and the use of the Unified Emission Factors (UEF) for Open

Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors were recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of gel coat employed. Since the styrene content of the gel coat is 29.5%, the UEF emission factor is determined from the following formula:

$$E.F. = 0.325 \times \% \text{ styrene} \times 2000 = 0.325 \times 0.295 \times 2000 = 191.75 \text{ lbs styrene/ton gel coat}$$

Therefore, the hourly emission rate is calculated as follows:

$$191.75 \text{ lbs styrene/ton gel coat} \times \text{lbs gel coat/hour} \times \text{ton/2000 lbs} = \text{lbs styrene/hour}$$

Emissions Limitation

OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method

Maintain daily records of the amount of gel coats (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each gel coat employed and the use of the UEF emission factor of 191.75 lbs styrene/ton gel coat as noted above. The daily emission rate is calculated as follows:

$$191.75 \text{ lbs styrene/ton gel coat} \times \text{lbs resin/day} \times \text{ton/2000 lbs} = \text{lbs styrene/day}$$

Emissions Limitation

The OC emissions from the use of resin shall not exceed 3 tons/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method

Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P005. The total rolling, 365-day OC emissions shall be determined by the following procedure:

$$\text{Total daily emissions} = P005$$

where, the emission unit identification represents the lbs OC per day per unit.

$$\text{rolling, 365-day emissions} = \text{Day 1} + \text{Day 2} + \dots + \text{Day 365}$$

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

$$\text{rolling, 365-day emissions} = \text{Day 2} + \text{Day 3} + \dots + \text{Day 365} + \text{Day 366}$$

$$\text{rolling, 365-day emissions} = \text{Day 3} + \text{Day 4} + \dots + \text{Day 366} + \text{Day 367}$$

Emissions Limitation

The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.1 ton/month.

Applicable Compliance Method

Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section 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 29.5 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.

b. 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.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.