



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/19/2011

Joe Masielle  
Dal-Little Fabricating, Incorporated  
11707 PUTNAM AVE  
Cleveland, OH 44105

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318008351  
Permit Number: P0107218  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: CDAQ





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Dal-Little Fabricating, Incorporated**

Facility ID:	1318008351
Permit Number:	P0107218
Permit Type:	Renewal
Issued:	1/19/2011
Effective:	1/19/2011
Expiration:	1/19/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
Dal-Little Fabricating, Incorporated

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## Authorization

Facility ID: 1318008351

Application Number(s): A0040452

Permit Number: P0107218

Permit Description: Renewal as a minor facility due to recalculation of potential to emit. PTI 13-04003 dated 1/23/2004 was issued as a Synthetic Minor to avoid Title V. Synthetic Minor restrictions are no longer needed. Permit is for spray and hand lay-up of resin/gelcoat for making and repairing reinforced plastic tanks and ducts.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 1/19/2011

Effective Date: 1/19/2011

Expiration Date: 1/19/2021

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Dal-Little Fabricating, Incorporated  
11707 PUTNAM AVE  
Cleveland, OH 44105

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

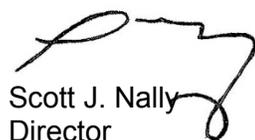
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107218  
Permit Description: Renewal as a minor facility due to recalculation of potential to emit. PTI 13-04003 dated 1/23/2004 was issued as a Synthetic Minor to avoid Title V. Synthetic Minor restrictions are no longer needed. Permit is for spray and hand lay-up of resin/gelcoat for making and repairing reinforced plastic tanks and ducts.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- |                                   |                             |
|-----------------------------------|-----------------------------|
| <b>Emissions Unit ID:</b>         | <b>P001</b>                 |
| Company Equipment ID:             | Atomized spray lay up booth |
| Superseded Permit Number:         | 13-04003                    |
| General Permit Category and Type: | Not Applicable              |
| <b>Emissions Unit ID:</b>         | <b>P002</b>                 |
| Company Equipment ID:             | Hand Lay-up Booth           |
| Superseded Permit Number:         | 13-04003                    |
| General Permit Category and Type: | Not Applicable              |

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above. The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2). The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted

emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred. If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31. You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official. You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated. Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**



1. P001, Atomized Spray Lay-up Booth

Operations, Property and/or Equipment Description:

Resin and Gel coat Spray Lay Up Booth

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-04003 issued 1/23/2003	Organic compound (OC) emissions shall not exceed 4.9 tons/year (TPY), excluding cleanup emissions.  Organic compound (OC) emissions from cleanup materials shall not exceed 1.7 TPY.  See b)(2)a. and b)(2)b. below
b.	OAC rule 3745-21-25	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The emissions of organic material from the resin/gel coat spray gun operation consist of styrene and methyl methacrylate, photochemically reactive materials and hazardous air pollutants (HAP).

b. Acetone and methylene chloride, shall be the only materials used for cleanup operations.

- c. The requirements of OAC rule 3745-21-25 do not apply because the potential to emit VOC for all reinforced plastic composites production operations is less than 10 tons per year.
- c) Operational Restrictions
- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information for each day for this emissions unit:
    - a. the company identification for each resin and gel coat employed;
    - b. the amount, in pounds, of each resin and gel coat employed;
    - c. the styrene content of each resin and gel coat, in percent by weight;
    - d. the methyl methacrylate content of each gel coat, in percent by weight;
    - e. the total styrene emission rate for the resin and gel coat employed determined in f)(1)a., in pounds per day;
    - f. the total methyl methacrylate emission rate for all the gel coats employed determined in accordance with f)(1)a., in pounds per day; and
    - g. the total daily OC emissions (sum of e and f).
  - (2) The permittee shall collect and record the following information for each year for the purpose of determining annual OC emissions:
    - a. the volume of each nonphotochemically reactive cleanup material employed, in gallons per year;
    - b. the OC content of each nonphotochemically reactive cleanup material, in pounds per gallon; and
    - c. the total OC emission rate for all nonphotochemically reactive cleanup materials, in pounds.
  - (3) The permit to install for this emissions unit (P001) was evaluated based on the actual materials (resins) 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 potentially 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), which has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV ( $\mu\text{g}/\text{m}^3$ ): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 307.5

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 2,028.63

Pollutant: Methyl methacrylate

TLV ( $\mu\text{g}/\text{m}^3$ ): 204,764

Maximum Hourly Emission Rate (lbs/hr): 8 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 248.8

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,875.35

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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 (typically 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, 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, then the permittee shall obtain a final permit to install/operate 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 its 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.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation: Organic compound (OC) emissions shall not exceed 4.9 TPY excluding cleanup.

Applicable Compliance Method: To calculate emissions from spray gun lay-up operations, the permittee shall employ the following formula:

$$E(\text{lay-up}) = \text{summation of } (W_i \times E_{Fi}) / 2000 \text{ lbs/ton}$$

Where:

$E(\text{lay-up})$  = the yearly organic compound emissions from all lay-up materials (resins and gel coats), in tons per year;

$i$  = subscript denoting a specific lay-up material (resin and gel coats) employed;

$W_i$  = the weight of lay-up material (resin and gel coats) " $i$ " employed, in tons per year (pounds per year divided by 2000 pounds per ton); and

$E_{Fi}$  = the styrene or MMA emission factor in pounds per ton, from lay-up material (resins and gel coats); where, " $E_{Fi}$ " = 296 lbs styrene/ton resin at 46% styrene content, 335 lbs styrene/ton gel coat at 35% styrene content and 45 lb MMA/ton gel coat at 5% MMA content. If a higher styrene content resin or coating is used, new emission factors need to be calculated.

These emission factors are based on the styrene and MMA content of the resin or gel coat and the mechanical application type (mechanical atomized), determined as calculated according to the formula in 40 CFR 63 Subpart WWWW, Table 1, titled "Equations to Calculate Organic HAP Emission Factors for Specific Open Molding and Centrifugal Casting Process", dated Aug. 25, 2005.

- b. Emission Limitation: Organic compound (OC) emissions from nonphotochemically reactive cleanup materials shall not exceed 1.7 tons per year.

Applicable Compliance Method: To calculate the emissions from nonphotochemically reactive cleanup materials, the permittee shall employ the following formula(s):

$$E(\text{npcr\_cleanup}) = \text{summation of } (V_i \times OC_i) \times 1 \text{ ton}/2000 \text{ lbs}$$

Where:

$E(\text{npcr\_cleanup})$  = the annual OC emissions from all nonphotochemically reactive cleanup materials, in pounds per year.

$i$  = subscript denoting a specific nonphotochemically reactive cleanup material employed.

$V_i$  = the volume of nonphotochemically reactive cleanup material " $i$ " employed, in gallons per year.

$OC_i$  = the OC content of nonphotochemically reactive cleanup material " $i$ ", in pounds per gallon.

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the styrene contents of all resins and gel coats, the methyl methacrylate content of all gel coats, and the OC content of all cleanup material employed in this emissions unit.

- g) Miscellaneous Requirements

- (1) None.



2. P002, Hand Lay-up Booth

Operations, Property and/or Equipment Description:

Resin and Gel coat Hand Lay Up Booth

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-04003 issued 1/23/2003	Organic compound (OC) emissions shall not exceed 3.9 tons/year (TPY), excluding cleanup emissions.  Organic compound (OC) emissions from cleanup materials shall not exceed 1.7 TPY.  See b)(2)a. and b)(2)b. below
b.	OAC rule 3745-21-25	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The emissions of organic material from gel coat manual application consist of styrene and methyl methacrylate, photochemically reactive materials and hazardous air pollutants (HAP).

b. Acetone and methylene chloride, shall be the only materials used for cleanup operations.

- c. The requirements of OAC rule 3745-21-25 do not apply because the potential to emit VOC for all reinforced plastic composites production operations is less than 10 tons per year.
- c) Operational Restrictions
- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information for each day for this emissions unit:
    - a. the company identification for each resin and gel coat employed;
    - b. the amount, in pounds, of each resin and gel coat employed;
    - c. the styrene content of each resin and gel coat, in percent by weight;
    - d. the methyl methacrylate content of each gel coat, in percent by weight;
    - e. the total styrene emission rate for the resin and gel coat employed determined in f)(1)a., in pounds per day;
    - f. the total methyl methacrylate emission rate for all the gel coats employed determined in accordance with f)(1)a., in pounds per day; and
    - g. the total daily OC emissions (sum of e and f).
  - (2) The permittee shall collect and record the following information for each year for the purpose of determining annual OC emissions:
    - a. the volume of each nonphotochemically reactive cleanup material employed, in gallons per year;
    - b. the OC content of each nonphotochemically reactive cleanup material, in pounds per gallon; and
    - c. the total OC emission rate for all nonphotochemically reactive cleanup materials, in pounds.
  - (3) The permit to install for this emissions unit was evaluated based on the actual materials (resins) 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 potentially 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), which

has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV ( $\mu\text{g}/\text{m}^3$ ): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 307.5

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 2,028.63

Pollutant: Methyl methacrylate

TLV ( $\mu\text{g}/\text{m}^3$ ): 204,764

Maximum Hourly Emission Rate (lbs/hr): 8 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 248.8

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,875.35

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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 (typically 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, 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, then the permittee shall obtain a final permit to install/operate 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 its 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.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation: Organic compound (OC) emissions shall not exceed 3.9 TPY excluding cleanup.
 

Applicable Compliance Method: To calculate emissions from hand lay-up operations, the permittee shall employ the following formula:

$$E(\text{lay-up}) = \text{summation of } (W_i \times E_{Fi}) / 2000 \text{ lbs/ton}$$

Where:

$E(\text{lay-up})$  = the yearly organic compound emissions from all lay-up materials (resins and gel coats), in tons per year;

$i$  = subscript denoting a specific lay-up material (resin and gel coats) employed;

$W_i$  = the weight of lay-up material (resin and gel coats) " $i$ " employed, in tons per year (pounds per year divided by 2000 pounds per ton); and

$E_{Fi}$  = the styrene or MMA emission factor in pounds per ton, from lay-up material (resins and gel coats); where, " $E_{Fi}$ " = 158 lbs styrene/ton resin at 46% styrene content, 335 lbs styrene/ton gel coat at 35% styrene content and 45 lb MMA/ton gel coat at 5% MMA content. If a higher styrene content resin or gel coat is used, new emission factors will need to be calculated.

These emission factors are based on the styrene and MMA content of the resin or gel coat and the manual hand lay-up application type, determined as calculated according to the formula in 40 CFR 63 Subpart WWWW, Table 1, titled "Equations to Calculate Organic HAP Emission Factors for Specific Open Molding and Centrifugal Casting Process", dated Aug. 25, 2005.

- b. Emission Limitation: Organic compound (OC) emissions from nonphotochemically reactive cleanup materials shall not exceed 1.7 tons per year.

Applicable Compliance Method: To calculate the emissions from nonphotochemically reactive cleanup materials, the permittee shall employ the following formula(s):

$$E(\text{npcr\_cleanup}) = \text{summation of } (V_i \times OC_i) \times 1 \text{ ton}/2000 \text{ lbs}$$

Where:

$E(\text{npcr\_cleanup})$  = the annual OC emissions from all nonphotochemically reactive cleanup materials, in pounds per year.

$i$  = subscript denoting a specific nonphotochemically reactive cleanup material employed.

$V_i$  = the volume of nonphotochemically reactive cleanup material " $i$ " employed, in gallons per year.

$OC_i$  = the OC content of nonphotochemically reactive cleanup material " $i$ ", in pounds per gallon.

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the styrene contents of all resins and gel coats, the methyl methacrylate content of all gel coats, and the OC content of all cleanup material employed in this emissions unit.
- g) Miscellaneous Requirements
- (1) None.