

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **02-16481**

A. Source Description

Paradise Power Boats has proposed a new boat manufacturing facility, including a gelcoat spray booth and hand layup or lamination operation.

B. Facility Emissions and Attainment Status

This is a new facility. With the installation of the above emissions units, Paradise Power Boats will be a major source for styrene, a Hazardous Air Pollutant (HAP), exceeding the Title V threshold of a 10 tons per year. The maximum potential for styrene emissions has been calculated to 11.65 tons per year. The facility is located in Lorain County which is in attainment for OC emissions.

C. Source Emissions

The facility has agreed to restrict their annual gelcoat and resin usages for the gelcoat spray booth and hand layup operation to 22 tons per year and 121 tons per year, respectively. With these restrictions, styrene emissions for the above emissions units will be 3.1 tons per year and 6.8 tons per year, respectively.

D. Conclusion

With restrictions on the annual gelcoat and resin usages, the facility's styrene emissions will be reduced to 9.9 tons per year, avoiding Title V permitting.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
LORAIN COUNTY
Application No: 02-16481

DATE: 6/6/2002

Paradise Power Boats
Pam Sobie
PO Box 1638
Elyria, OH 44036

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-16481

Application Number: 02-16481
APS Premise Number: 0247040982
Permit Fee: **To be entered upon final issuance**
Name of Facility: Paradise Power Boats
Person to Contact: Pam Sobie
Address: PO Box 1638
Elyria, OH 44036

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10800 Middle Ave
Elyria, Ohio**

Description of proposed emissions unit(s):
gelcoat spray booth and lamination booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

Paradise Power Boats

Facility ID: 0247040982

PTI Application: 02-16481

Issued: To be entered upon final issuance

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

Paradise Power Boats

PTI Application: 02-16481

Issued: To be entered upon final issuance

lead to such sanctions

Facility ID: 0247040982

Paradise Power Boats

Facility ID: 0247040982

PTI Application: 02-16481

Issued: To be entered upon final issuance

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	11.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Gelcoat spray booth for boat manufacturing.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 6.60 pounds per hour, 21.52 pounds per day and 3.9 tons per year. See section A.2.a. The requirements of this rule also include the requirements of OAC rule 3745-31-05(D) and compliance with the Air Toxic Policy, as specified in sections C.3, C.4 and C.5.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(D)	See sections A.2.b, A.2.c, A.2.d and B.1.

2. Additional Terms and Conditions

- 2.a The emissions of organic material from the gelcoat materials consist of styrene and/or methyl methacrylate (MMA), which are photochemically reactive materials and hazardous air pollutants (HAPs).
- 2.b Styrene emissions from this emissions unit shall not exceed 3.1 tons per year, as a rolling

12-month summation.

- 2.c** MMA emissions from this emissions unit shall not exceed 0.8 tons per year, as a rolling 12-month summation.
- 2.d** OC emissions from this emissions unit shall not exceed 3.9 tons per year, as a rolling 12-month summation.

B. Operational Restrictions

- 1. The maximum annual gelcoat usage for this emissions unit shall not exceed 22 tons, based upon a rolling, 12-month summation of the gelcoat usage figures.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the gelcoat usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative gelcoat usage, (tons)</u>
1	1.8
1-2	3.7
1-3	5.5
1-4	7.3
1-5	9.2
1-6	11.0
1-7	12.8
1-8	14.7
1-9	16.5
1-10	18.3
1-11	20.2
1-12	22.0

After the first 12 calendar months of operation, compliance with the annual resin usage limitation shall be based upon a rolling, 12-month summation of the resin usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information daily for the emissions unit (R001):
 - a. The name and identification number of each gelcoat employed.

Para

PTI

Emissions Unit ID: **R001**

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- b. An identification of the type of application (i.e., gelcoat application or gelcoat controlled spray application, etc.) employed.
- c. The number of tons of each gelcoat employed, in tons per day.
- d. The OC contents of styrene and MMA of each gelcoat employed, in percent by weight.
- e. The total number of hours the emissions unit was in operation, in hours per day.
- f. The calculated emission factors for emission rates in pounds of styrene per ton of gelcoat employed and pounds of MMA per ton of gel employed, in accordance with "CFA guidance, Table 3 - Unified Emission Factor (UEF) Table, UEFs for Open Molding of Composites, April 7, 1999."
- g. The total styrene emission rate for all gelcoats employed, calculated as the sum of (c) x (f) from section C.1 for each gelcoat, in pounds per day.
- h. The total MMA emission rate for all gelcoats employed, calculated as the sum of (c) x (f) from section C.1 for each gelcoat, in pounds per day.
- i. The total OC emission rate for all gelcoats employed, calculated as the sum of (g) and (h) from section C.1, in pounds per day.
- j. The total OC emission rate for all gelcoats employed, calculated as the quotient of (i)/(e) from section C.1, in pounds per hour (average).

The gelcoat information must be for the gelcoats as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information monthly for the emissions unit (R001):
 - a. The total number of tons of each gelcoat employed, calculated as the sum of tons of gelcoat employed daily from section C.1.c, in tons per month.
 - b. The total styrene emission rate for all gelcoats employed, calculated as the sum of pounds of daily styrene emissions from section C.1.g, in pounds of per month.
 - c. The total MMA emission rate for all gelcoats employed, calculated as the sum of pounds

Para

PTI

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

of daily MMA emissions from section C.1.h, in pounds of per month.

- d. The total number of tons of each gelcoat employed, as a rolling 12-month summation, calculated as the sum of tons of gelcoat employed monthly from section C.2.a for 12 consecutive months. Each new month constitutes a new rolling 12-month summation.
- e. The total styrene emission rate for all gelcoats employed, in tons per year as a rolling 12-month summation, calculated as the sum of pounds of monthly styrene emissions from section C.2.b for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.

Para

PTI

Emissions Unit ID: **R001**

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- f. The total MMA emission rate for all gelcoats employed, in tons per year as a rolling 12-month summation, calculated as the sum of pounds of monthly MMA emissions from section C.2.c for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
 - g. The total OC emission rate for all gelcoats employed, in tons per year as a rolling 12-month summation, calculated as the sum of (e) and (f) from section C.2 for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
3. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 5.21

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 361

MAGLC (ug/m³): 2029

Pollutant: Methyl Methacrylate (MMA)

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 1.39

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 96

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4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

Para

PTI

Emissions Unit ID: **R001**

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D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

Para

PTI

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Section C.2.

Emissions Unit ID: **R001**

Para
PTI

Emissions Unit ID: **R001**

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4. Emission Limitation:
0.8 tons per year of MMA emissions, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

5. Emission Limitation:
3.9 tons per year of OC emissions, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. Paragraphs A.2.b, A.2.c, A.2.d, B.1, C.1, C.2, D.1, E.3, E.4 and E.5 of these Special Terms and Conditions constitute the federally enforceable portions of this permit.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
R002 - Lamination: Hand layup, manual application of resins and fiberglass for the manufacturing of boats, specifically boat hulls and decks, using buckets, brushes and hand tools.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 5.36 pounds per hour, 37.13 pounds per day and 6.8 tons per year. See section A.2.a. Cleanup materials: OC emissions shall not exceed 1.2 tons per year. See section A.2.b. The requirements of this rule also include the requirements of OAC rule 3745-31-05(D) and compliance with the Air Toxic Policy, as specified in sections C.3, C.4 and C.5.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(D)	See sections A.2.c and B.1

2. Additional Terms and Conditions

- 2.a The emissions of organic material from the polyester resin materials consist of styrene,

Para

PTI

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

which is photochemically reactive materials and hazardous air pollutant (HAP).

- 2.b** The permittee shall not employ any cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 2.c** OC (styrene) emissions from this emissions unit shall not exceed 6.8 tons per year, as a rolling 12-month summation.

B. Operational Restrictions

- 1. The maximum annual gelcoat usage for this emissions unit shall not exceed 121 tons, based upon a rolling, 12-month summation of the gelcoat usage figures.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the gelcoat usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative gelcoat usage, (tons)</u>
1	10.1
1-2	20.2
1-3	30.3
1-4	40.3
1-5	50.4
1-6	60.5
1-7	70.6
1-8	80.7
1-9	90.8
1-10	100.8
1-11	110.9
1-12	121.0

After the first 12 calendar months of operation, compliance with the annual resin usage limitation shall be based upon a rolling, 12-month summation of the resin usage figures.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information daily for the emissions unit (R002):
 - a. The name and identification number of each polyester resin employed.

Para

PTI

Emissions Unit ID: **R002**

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- b. An identification of the type of application (i.e., manual, manual w/ vapor suppressed resin VSR, mechanical atomized, etc.) employed.

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- c. The number of tons of each polyester resins employed, in tons per day.
- d. The OC content of styrene of each polyester resin employed, in percent by weight.
- e. The name and identification number of each cleanup material employed.
- f. The number of gallons of each cleanup material employed, in gallons per day.
- g. The OC content of each cleanup material employed, in pounds of OC per gallon.
- h. The total number of hours the emissions unit was in operation, in hours per day.
- i. The calculated emission factors for emission rates in pounds of styrene per ton of resin employed, in accordance with "CFA Guidance, Table 3 - Unified Emission Factor (UEF) Table, UEFs for Open Molding of Composites, April 7, 1999."
- j. The total OC (styrene) emission rate for all polyester resins employed, calculated as the sum of (c) x (i) from section C.1 for each polyester resin, in pounds per day.
- k. The total OC emission rate for all polyester resins employed, calculated as the quotient of (j)/(h) from section C.1, in pounds per hour (average).
- l. The total OC emission rate for all cleanup materials employed, calculated as the sum of (f) x (g) from section C.1 for each cleanup material, in pounds per day.

The polyester resin information must be for the polyester resins as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information monthly for the emissions unit (R002):
 - a. The total number of tons of each polyester resin employed, calculated as the sum of tons of polyester resin employed daily from section C.1.c, in tons per month.
 - b. The total OC (styrene) emission rate for all polyester resins employed, calculated as the sum of pounds of daily styrene emissions from section C.1.j, in pounds of per month.
 - c. The total number of tons of each polyester resin employed, as a rolling 12-month summation, calculated as the sum of tons of polyester resin employed monthly from section C.2.a, for 12 consecutive months. Each new month constitutes a new rolling

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12-month summation.

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

- d. The total OC (styrene) emission rate for all polyester resins employed, in tons per year as a rolling 12-month summation, calculated as the sum of pounds of monthly styrene emissions from section C.2.b for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
 - e. The total OC emission rate for all cleanup materials employed, in tons per year, calculated as the sum of pounds of daily OC emissions from section C.1.1 for 12 consecutive months in a calendar year, and divided by 2000.
3. The permit to install for this emissions unit R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 5.36

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 473

MAGLC (ug/m³): 2029

Pollutant: Acetone

TLV (mg/m³): 1187

Maximum Hourly Emission Rate (lbs/hr): 0.27

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 4.41

MAGLC (ug/m³): 28264

Paradise Power Boats
PTI Application 02-16481
Issue

Facility ID: 0247040982

Emissions Unit ID: R002

Issued: To be entered upon final issuance

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

5. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

Para

PTI /

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:
 - a. Each month during which the total annual polyester resin usage for this emissions unit exceeded 121 tons per year as a rolling 12-month summation and the actual polyester resin usage for each such 12-month summation.
 - b. Each day during which the total OC emissions exceeded 5.36 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each day during which the total OC emissions exceeded 37.13 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - d. Each month during which the total OC (styrene) emissions exceeded 6.8 tons per year as a rolling 12-month summation and the actual styrene emissions for each such 12-month summation.
 - e. Each year during which the total OC emissions from cleanup materials exceeded 1.2 tons per year and the actual OC emissions for each such year.
 - f. Each day during which a photochemically reactive material was employed for cleanup.

E. Testing Requirements

1. Emission Limitation:
5.36 pounds per day of OC (styrene, average) emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C
2. Emission Limitation:
37.13 pounds per day of OC (styrene) emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

Paradise Power Boats
PTI Application 02-16481
Issue

Facility ID: 0247040982

Emissions Unit ID: **R002**

3. Emission Limitation:
6.8 tons per year of OC (styrene) emissions, as a rolling 12-month summation, excluding cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

Para

PTI

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

4. Emission Limitation:
1.2 tons per year of OC emissions from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C

F. Miscellaneous Requirements

1. Paragraphs A.2.c, B.1, C.1, C.2, D.1 and E.3 of these Special Terms and Conditions constitute the federally enforceable portions of this permit.