

Facility ID: 0278080819 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](#)
- [Go to Part II for Emissions Unit P003](#)

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Facility ID: 0278080819 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - fiberglass layup work area no. 1	OAC rule 3745-31-05(A)(3) (PTI 02-22437)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation.  Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup.
	OAC rule 3745-31-05(C)	See sections B.1 and B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below. Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.

**2. Additional Terms and Conditions**

- (a) The emissions from emissions units P001, P002 and P003, combined, shall not exceed:
  - i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and
  - ii. 12.0 tons/year of total combined HAPS,
 based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximun Allowable Maximun Allowable  
Cumulative Emissions Cumulative Emissions  
of Individual HAP Emissions of Aggregate HAP Emissions  
Month(s) (tons) (tons)

1	3.0	4.0
1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined

HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Operational Restrictions**

1. Acetone shall be the only OC material employed for cleanup.
2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the lay up operation:
  - a. the company identification for each photochemically reactive material employed;
  - b. the number of pounds of each photochemically reactive material employed;
  - c. the OC content of each photochemically reactive material, in percent by weight;
  - d. the total OC emission rate for all photochemically reactive materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:
  - a. the name and identification of each resin, gel coat and catalyst material employed;
  - b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;
  - c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;
  - d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;
  - e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;
  - f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;
  - g. a summation of individual and total HAPs emissions, in pounds;
  - h. the company identification for each clean up material employed;
  - i. the amount of each cleanup material employed, in gallons;
  - j. the OC content of each cleanup material employed, in pounds per gallon; and
  - k. the total OC emission rate for all cleanup materials, i.e.,(i) x (j), in pounds.
3. The permit to install for this emissions unit (P001) was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene  
 TLV (mg/m3): 85.0  
 Maximum Hourly Emission Rate (lbs/hr): 5.55  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0  
 MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and
  - c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.
4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPS emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

OC emissions shall not exceed 8 pounds per hour from the lay up coat operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.

Emission Limitation:

OC emissions shall not exceed 40 pounds per day from the lay up coat operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.

Emission Limitation:

OC emissions shall not exceed 7.3 tons per year from the lay up operation.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The individual HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 9.0 tons/year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The total combined HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 12.0 tons/year.

based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.  
Emission Limitation:

OC emissions shall not exceed 1080 pounds per month from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.  
Emission Limitation:

OC emissions shall not exceed 6.5 tons per year from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

- 2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.
- F. **Miscellaneous Requirements**

- 1. The following terms and conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC rule 3745-35-07: A through F, except C.3.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0278080819 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>
P002 - fiberglass layup work area no. 2	OAC rule 3745-31-05(A)(3) (PTI 02-22437)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation.  Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup.
	OAC rule 3745-31-05(C)	See sections B.1 and B.2 below.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below. Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.

**2. Additional Terms and Conditions**

- (a) The emissions from emissions units P001, P002 and P003, combined, shall not exceed:
  - i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and
  - ii. 12.0 tons/year of total combined HAPS,
 based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable Maximum Allowable  
 Cumulative Emissions Cumulative Emissions  
 of Individual HAP Emissions of Aggregate HAP Emissions  
 Month(s) (tons) (tons)

1	3.0	4.0
1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Operational Restrictions**

1. Acetone shall be the only OC material employed for cleanup.
2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the lay up operation:
  - a. the company identification for each photochemically reactive material employed;
  - b. the number of pounds of each photochemically reactive material employed;
  - c. the OC content of each photochemically reactive material, in percent by weight;
  - d. the total OC emission rate for all photochemically reactive materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:
  - a. the name and identification of each resin, gel coat and catalyst material employed;
  - b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;
  - c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;
  - d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;
  - e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;
  - f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;
  - g. a summation of individual and total HAPs emissions, in pounds;
  - h. the company identification for each clean up material employed;
  - i. the amount of each cleanup material employed, in gallons;
  - j. the OC content of each cleanup material employed, in pounds per gallon; and
  - k. the total OC emission rate for all cleanup materials, i.e.,(i) x (j), in pounds.

3. The permit to install for this emissions unit (P002) was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene  
 TLV (mg/m3): 85.0

Maximum Hourly Emission Rate (lbs/hr): 5.55

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0

MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and
  - c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.
4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPS emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
OC emissions shall not exceed 8 pounds per hour from the lay up coat operation.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.  
Emission Limitation:  
  
OC emissions shall not exceed 40 pounds per day from the lay up coat operation.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.  
Emission Limitation:  
  
OC emissions shall not exceed 7.3 tons per year from the lay up operation.  
  
Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The individual HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 9.0 tons/year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The total combined HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 12.0 tons/year.

based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

OC emissions shall not exceed 1080 pounds per month from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.

Emission Limitation:

OC emissions shall not exceed 6.5 tons per year from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

- 2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC rule 3745-35-07: A through F, except C.3.

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**Facility ID: 0278080819 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 - fiberglass layup work area no. 3	OAC rule 3745-31-05(A)(3) (PTI 02-22437)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year from the lay up operation.  Emissions of OC shall not exceed 1080 pounds per month and 6.5 tons per year from facility-wide cleanup.

OAC rule 3745-31-05(C)  
 OAC rule 3745-21-07(G)(2)

See sections B.1 and B.2 below.  
 See section A.2.a below.  
 Emissions of OC shall not exceed 8 pounds per hour  
 and 40 pounds per day.

**2. Additional Terms and Conditions**

- (a) The emissions from emissions units P001, P002 and P003, combined, shall not exceed:
  - i. 9.0 tons/year of any individual hazardous air pollutant (HAP); and
  - ii. 12.0 tons/year of total combined HAPS,
 based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Individual HAP Emissions (tons)	Maximum Allowable Cumulative HAP Emissions (tons)
1	3.0	4.0
1-2	3.0	4.0
1-3	3.0	4.0
1-4	3.0	4.0
1-5	3.75	5.0
1-6	4.5	6.0
1-7	5.25	7.0
1-8	6.0	8.0
1-9	6.75	9.0
1-10	7.5	10.0
1-11	8.25	11.0
1-12	9.0	12.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for any individual HAP and total combined HAPS shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Operational Restrictions**

- 1. Acetone shall be the only OC material employed for cleanup.
- 2. The permittee shall keep containers that store HAP-containing materials closed or covered except during addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information for each day for the lay up operation:
  - a. the company identification for each photochemically reactive material employed;
  - b. the number of pounds of each photochemically reactive material employed;
  - c. the OC content of each photochemically reactive material, in percent by weight;
  - d. the total OC emission rate for all photochemically reactive materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
- 2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P003:
  - a. the name and identification of each resin, gel coat and catalyst material employed;
  - b. the amount of each resin, gel coat and catalyst material employed, in pounds and tons;
  - c. the HAP content, in percent by weight, for each resin, gel coat and catalyst material employed;
  - d. determine the HAP emission factor for each resin and gel coat in the process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW, or the most recent update to 40 CFR Part 63, Subpart WWWW;
  - e. the HAP emissions for each resin and gel coat in the process stream, in lbs/day, calculated using the emission factor(s) determined in section C.2.d and the resin and gel coat usage in section C.2.b, in pounds;
  - f. the amount of any HAPs emissions in the catalyst, determined using information in sections C.2.b and C.2.c, in pounds;
  - g. a summation of individual and total HAPs emissions, in pounds;

- h. the company identification for each clean up material employed;
  - i. the amount of each cleanup material employed, in gallons;
  - j. the OC content of each cleanup material employed, in pounds per gallon; and
  - k. the total OC emission rate for all cleanup materials, i.e., (i) x (j), in pounds.
- 3. The permit to install for this emissions unit (P003) was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene  
 TLV (mg/m3): 85.0  
 Maximum Hourly Emission Rate (lbs/hr): 5.55  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 321.0  
 MAGLC (ug/m3): 2026

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the lay up operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from the lay up operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and
  - c. an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and total combined HAPS and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
- 3. The permittee shall submit deviation (excursion) reports in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.
- 4. The permittee shall submit annual reports that specify the OC, cleanup, individual HAP, and total combined HAPS emissions from emissions units P001, P002 and P003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be

determined in accordance with the following methods:

Emission Limitation:

OC emissions shall not exceed 8 pounds per hour from the lay up coat operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.f.

Emission Limitation:

OC emissions shall not exceed 40 pounds per day from the lay up coat operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.d.

Emission Limitation:

OC emissions shall not exceed 7.3 tons per year from the lay up operation.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section C.1.d, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The individual HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 9.0 tons/year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.e, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

The total combined HAP emissions from emissions units P001, P002 and P003, combined, shall not exceed 12.0 tons/year.

based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.g, for the calendar year, and then dividing by 2000 lbs per ton.

Emission Limitation:

OC emissions shall not exceed 1080 pounds per month from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.2.k.

Emission Limitation:

OC emissions shall not exceed 6.5 tons per year from facility-wide cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly emissions, as determined in the record keeping requirements specified in section C.2.k, for the calendar year, and then dividing by 2000 lbs per ton.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the lay up materials.

F. **Miscellaneous Requirements**

1. The following terms and conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC rule 3745-35-07: A through F, except C.3.