

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

Permit To Install **02-18604**

A. Source Description Monarch

Plastics is a manufacturer of fiberglass parts. Monarch operates three fiberglass emissions units: R001 vapor suppressed, mechanical atomized spray station (chopper gun); R002 vacuum bag molding without rollout; and R003 uncontrolled spray, gelcoat booth. Emissions units are subject to OAC rule 3745-21-07(G)(2). Facility operates one 8 hour shift, 5 days per week.

B. Facility Emissions and Attainment Status

Monarch Plastics PTE for styrene is 21.9 tons per year. Actual emissions from the facility have never exceeded 7 tons per year. Monarch Plastics applied for a Synthetic Minor PTI to limit the potential emissions below the 10 ton per year Title V threshold and MACT Subpart WWWW, Reinforced Plastic Composites Production threshold. The MACT was published final on April 21, 2003 in the CFR and the first compliance date has not passed. No requirements are included in the MACT for areas sources.

Monarch Plastics is located in Orrville, Wayne County which is attainment for ozone.

C. Source Emissions

Each of the three emissions unit is limited to 8 lbs per hour and 40 lbs per day of OC emissions according to OAC rule 3745-21-07(G)(2). Each of the three emissions units is also limited to 7.3 tons per year of OC emissions under BAT. Emissions of a single HAP (styrene) are limited to 9.9 tons per rolling, 12-month period from emissions unit R001, R002 and R003, combined. Daily usage records and material balance emissions records are keep to determine compliance with the 8 lbs/hr and 40 lbs/d OC limit. These daily records are used to calculate the monthly single HAP emissions and the rolling, 12-month single HAP emissions.

D. Conclusion

This PTI provides federally enforceable single HAP emissions limits below the Title V and MACT threshold of 10 tons per year.



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
WAYNE COUNTY
Application No: 02-18604**

CERTIFIED MAIL

DATE: 3/11/2004

Monarch Plastics, Inc.
Larry Casky, Sr.
516 Jefferson Avenue
Orrville, OH 44667

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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO

WAYNE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 02-18604 FOR AN AIR CONTAMINANT SOURCE FOR
MONARCH PLASTICS, INC.

On 3/11/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Monarch Plastics, Inc.**, located at **516 Jefferson Avenue, Orrville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18604:

Chopper Gun Area, Vacuum Bag Molding, Gelcoat Booth, Grinding Room/Assembly Area.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**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 02-18604

Application Number: 02-18604
APS Premise Number: 0285010268
Permit Fee: **To be entered upon final issuance**
Name of Facility: Monarch Plastics, Inc.
Person to Contact: Larry Casky, Sr.
Address: 516 Jefferson Avenue
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:

**516 Jefferson Avenue
Orrville, Ohio**

Description of proposed emissions unit(s):

Chopper Gun Area, Vacuum Bag Molding, Gelcoat Booth, Grinding Room/Assembly Area.

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

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

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 lead to such sanctions

Monarch Plastics, Inc.

Facility ID: 0285010268

PTI Application: 02-18604

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

Issued: To be entered upon final issuance

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 ninety (90) 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	21.9
Single HAP(styrene)	9.9
PE	3.8

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>
P001 - Grinding and finishing room controlled by a 5,000 cfm dust collector.	OAC rule 3745-31-05(A)(3)	See A.2.a and A.2.b below.
	OAC rule 3745-17-07(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Less stringent than OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Particulate emissions shall not exceed 0.02 grain per dscf of exhaust gas, 0.86 pound per hour and 3.8 tons per year from the dust collector exhaust.
- 2.b No visible emissions from the dust collector exhaust.

B. Operational Restrictions

1. The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

Mona]

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P001**

Mona

PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. When the dust collector is vented outside the building, the permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the dust collector. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhaust from the dust collector for this emissions unit are currently vented back into the building. This is the normal operating mode for this emissions unit.

2. The permittee shall maintain copies of the record of the weekly visible emissions checks at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

D. Reporting Requirements

1. The permittee shall submit quarterly visible emission check deviation (excursion) reports that identify all days that visible emissions were noted in the operations log and the corrective measures taken.
2. All quarterly deviation (excursion) reports shall be submitted in accordance with Section 2.b. of the General Terms and Conditions.

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:

- a. Emission Limitation:
0.02 gr/dscf and 0.86 pound per hour of particulate matter emissions

Applicable Compliance Methods:

If required compliance shall be determined according to OAC rule 3745-17-03(B)(10), (Method 5, 40 CFR 60, Appendix A).

- b. Emission Limitation:
3.8 tons per year of particulate matter emissions

Applicable Compliance Methods:

Mona

PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

Compliance with this emission limitation shall be determined by the following equation:

$$0.02 \text{ gr/dscf} * 5000 \text{ scfm} * 60 \text{ min/hr} * \text{lb}/7000 \text{ gr} * \text{ton}/2000 \text{ lbs} * 8760 \text{ hrs/yr}$$

where:

0.02 gr/dscf is the allowable grain loading limit; and

5000 scfm is the air flow of the dust collector.

- c. Emission Limitation:
No visible emissions from the dust collector exhaust.

Applicable Compliance Methods:

When the dust collector exhaust is vented inside, compliance with the no visible emission limit for the exhaust from the dust collector shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)

When the dust collector exhaust is vented outside, compliance with the no visible emissions limit for the exhaust from the dust collect shall be determined using USEPA Method 22.

F. Miscellaneous Requirements

None

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 - Chopped and hand lay-up fiberglass parts manufacturing area (mechanically atomized application currently using vapor suppressed resin)	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 7.3 tons per year from resin and clean-up materials. Also see A.2.b below.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-35-07 (B)	See A.2.a below.
		See A.2.c below.

2. Additional Terms and Conditions

- 2.a The emissions of organic compounds (OC) from the polyester resin materials consist of styrene, which is photochemically reactive materials and hazardous air pollutant (HAP). OC emissions shall not exceed 8.0 pounds per hour and 40.0 pounds per day.
- 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 Single HAP (styrene) emissions from this emissions unit shall not exceed 9.9 tons per year, as a rolling 12-month summation., from emissions units R001, R002, and R003, combined.

Mona

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

- 2.d** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

1. The permittee has existing production records such that there is no need for first year monthly HAP emissions limitations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information daily for the emissions unit:
 - a. The name and identification number of each polyester resin employed.
 - b. An identification of the type of application (i.e., mechanical atomized with vapor suppressed resin, etc.) employed.
 - c. The amount of each polyester resin employed, in pounds per day.
 - d. The OC (styrene) content of each polyester resin 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 pound of resin employed, in accordance with "CFA Guidance, Table 3 - Unified Emission Factor (UEF) Table, UEFs for Open Molding of Composites, July 23, 2001."
 - g. The total OC (styrene) emission rate for all polyester resins employed, calculated as the sum of (c) x (f) for each polyester resin, in pounds per day.
 - h. The total OC emission rate for all polyester resins employed, calculated as the quotient of (g)/(e), in pounds per hour (average).

Mona

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

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

2. The permittee shall collect and record the following information monthly for emissions units R001, R002 and R003 combined:
 - a. The total single HAP (styrene) emission rate for all polyester resins employed, calculated as the sum of pounds of daily styrene emissions from section C.1.g, in pounds of per month.

- b. The total single HAP (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.a for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
3. The permittee shall collect and record the following information for each month for this emission unit:
 - a. The name and identification number of each cleanup material employed.
 - b. Documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each cleanup material employed less material recovered, in gallons.
 - d. The OC content of each cleanup material employed, in pounds of OC per gallon.
 - e. The total OC emission rate for all cleanup materials employed, in tons, calculated as the sum of (c) time (d), and divided by 2000.

D. Reporting Requirements

1. The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:
 - a. Each day during which the total OC emissions exceeded 8.0 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - b. Each day during which the total OC emissions exceeded 40.0 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each month during which the total single HAP (styrene) emissions from emissions units

Mona

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

R001, R002 and R003, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual styrene emissions for each such 12-month summation.

3. The permittee shall submit annual reports that identify:
 - a. The total OC emissions from resins and cleanup materials from this emissions unit.
 - b. The total single HAP (styrene) emissions from from emissions units R001, R002 and R003 combined.

E. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.0 pounds per hour of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.
 - b. Emission Limitation:
40 pounds per day of OC emissions, excluding cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.
 - c. Emission Limitation:
7.3 tons per year of OC emissions

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1 and C.3, and shall be the summation of the 365 daily resin OC emissions rates for the calendar year divided by 2000, plus the total emissions from cleanup materials for the twelve months in the calendar year.
 - d. Emission Limitation:
9.9 tons per year of single HAP (styrene) emissions, as a rolling 12-month summation

Mona]

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

from R001, R002 and R003, combined.

Applicable Compliance Method:

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

2. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the

Monarch Plastics, Inc.
PTI A
Issued

Facility ID: 0285010268

Emissions Unit ID: **R001**

manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.

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 - Vacuum bag fiberglass part production (manual application and cover-cured prior to roll-out)	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 7.3 tons per year from resins and clean-up materials. Also see A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	See A.2.a below.
	OAC rule 3745-35-07 (B)	See A.2.c below.

2. Additional Terms and Conditions

- 2.a The emissions of organic compounds from the polyester resin materials consist of styrene, which is photochemically reactive materials and hazardous air pollutant (HAP). OC emissions shall not exceed 8.0 pounds per hour and 40.0 pounds per day.
- 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 Single HAP (styrene) emissions from this emissions unit shall not exceed 9.9 tons per year, as a rolling 12-month summation., from emissions units R001, R002, and R003, combined.

Mona

PTI A

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

- 2.d** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

1. The permittee has existing production records such that there is no need for first year monthly HAP emissions limitations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information daily for the emissions unit:
 - a. The name and identification number of each polyester resin employed.
 - b. An identification of the type of application (i.e., manual application and cover-cured prior to roll-out etc.) employed.
 - c. The amount of each polyester resin employed, in pounds per day.
 - d. The OC (styrene) content of each polyester resin 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 pound of resin employed, in accordance with "CFA Guidance, Table 3 - Unified Emission Factor (UEF) Table, UEFs for Open Molding of Composites, July 23, 2001."
 - g. The total OC (styrene) emission rate for all polyester resins employed, calculated as the sum of (c) x (f) for each polyester resin, in pounds per day.
 - h. The total OC emission rate for all polyester resins employed, calculated as the quotient of (g)/(e), in pounds per hour (average).

Emissions Unit ID: **R002**

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

2. The permittee shall collect and record the following information monthly for emissions units R001, R002 and R003 combined:
 - a. The total single HAP (styrene) emission rate for all polyester resins employed, calculated as the sum of pounds of daily styrene emissions from section C.1.g, in pounds of per month.
 - b. The total single HAP (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.a for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
3. The permittee shall collect and record the following information for each month for this emission unit:
 - a. The name and identification number of each cleanup material employed.
 - b. Documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each cleanup material employed less material recovered, in gallons.
 - d. The OC content of each cleanup material employed, in pounds of OC per gallon.
 - e. The total OC emission rate for all cleanup materials employed, in tons, calculated as the sum of (c) time (d), and divided by 2000.

D. Reporting Requirements

1. The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each of the

Mona

PTI A

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

following:

- a. Each day during which the total OC emissions exceeded 8.0 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - b. Each day during which the total OC emissions exceeded 40.0 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each month during which the total single HAP (styrene) emissions from emissions units R001, R002 and R003, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual styrene emissions for each such 12-month summation.
3. The permittee shall submit annual reports that identify:
- a. The total OC emissions from resins and cleanup materials from this emissions unit.

Mona

PTI A

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

- b. The total single HAP (styrene) emissions from from emissions units R001, R002 and R003 combined.

E. Testing Requirements

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

- a. Emission Limitation:
8.0 pounds per hour of OC emissions, excluding cleanup materials

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

- b. Emission Limitation:
40 pounds per day of OC emissions, excluding cleanup materials

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

- c. Emission Limitation:
7.3 tons per year of OC emissions

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1 and C.3, and shall be the summation of the 365 daily resin OC emissions rates for the calendar year divided by 2000, plus the total emissions from cleanup materials for the twelve months in the calendar year.

- d. Emission Limitation:
9.9 tons per year of single HAP (styrene) emissions, as a rolling 12-month summation from R001, R002 and R003, combined.

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

Emissions Unit ID: **R002**

2. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.

Issued: To be entered upon final issuance

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>
R003 - Gelcoat application to manufacture fiberglass parts	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 7.3 tons per year from resins and clean-up materials. Also see A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	See A.2.a below.
	OAC rule 3745-35-07 (B)	See A.2.c below.

2. Additional Terms and Conditions

- 2.a The emissions of organic compounds from the polyester resin materials consist of styrene, which is photochemically reactive materials and hazardous air pollutant (HAP). OC emissions shall not exceed 8.0 pounds per hour and 40.0 pounds per day.
- 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 Single HAP (styrene) emissions from this emissions unit shall not exceed 9.9 tons per year, as a rolling 12-month summation., from emissions units R001, R002, and R003,

Mona

PTI A

Emissions Unit ID: **R003**

Issued: To be entered upon final issuance

combined.

- 2.d** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

1. The permittee has existing production records such that there is no need for first year monthly HAP emissions limitations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information daily for the emissions unit:
 - a. The name and identification number of each polyester resin employed.
 - b. An identification of the type of application (i.e., gelcoat application, etc.) employed.
 - c. The amount of each polyester resin employed, in pounds per day.
 - d. The OC (styrene) content of each polyester resin 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 pound of resin employed, in accordance with "CFA Guidance, Table 3 - Unified Emission Factor (UEF) Table, UEFs for Open Molding of Composites, July 23, 2001."
 - g. The total OC (styrene) emission rate for all polyester resins employed, calculated as the sum of (c) x (f) for each polyester resin, in pounds per day.
 - h. The total OC emission rate for all polyester resins employed, calculated as the quotient of (g)/(e), in pounds per hour (average).

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

2. The permittee shall collect and record the following information monthly for emissions units R001, R002 and R003 combined:
 - a. The total single HAP (styrene) emission rate for all polyester resins employed, calculated as the sum of pounds of daily styrene emissions from section C.1.g, in pounds of per month.
 - b. The total single HAP (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.a for 12 consecutive months, and divided by 2000. Each new month constitutes a new rolling 12-month summation.
3. The permittee shall collect and record the following information for each month for this emission unit:
 - a. The name and identification number of each cleanup material employed.
 - b. Documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each cleanup material employed less material recovered, in gallons.
 - d. The OC content of each cleanup material employed, in pounds of OC per gallon.
 - e. The total OC emission rate for all cleanup materials employed, in tons, calculated as the sum of (c) time (d), and divided by 2000.

D. Reporting Requirements

1. The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

Mona

PTI A

Emissions Unit ID: **R003**

Issued: To be entered upon final issuance

2. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:
 - a. Each day during which the total OC emissions exceeded 8.0 pounds per hour (average) and the actual OC emissions for each such day (excluding cleanup materials).
 - b. Each day during which the total OC emissions exceeded 40.0 pounds per day and the actual OC emissions for each such day (excluding cleanup materials).
 - c. Each month during which the total single HAP (styrene) emissions from emissions units R001, R002 and R003, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual styrene emissions for each such 12-month summation.
3. The permittee shall submit annual reports that identify:
 - a. The total OC emissions from resins and cleanup materials from this emissions unit.

Issued: To be entered upon final issuance

- b. The total single HAP (styrene) emissions from from emissions units R001, R002 and R003 combined.

E. Testing Requirements

- 1. Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
8.0 pounds per hour of OC emissions, excluding cleanup materials

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

- b. Emission Limitation:
40 pounds per day of OC emissions, excluding cleanup materials

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

- c. Emission Limitation:
7.3 tons per year of OC emissions

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1 and C.3, and shall be the summation of the 365 daily resin OC emissions rates for the calendar year divided by 2000, plus the total emissions from cleanup materials for the twelve months in the calendar year.

- d. Emission Limitation:
9.9 tons per year of single HAP (styrene) emissions, as a rolling 12-month summation from R001, R002 and R003, combined.

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

Emissions Unit ID: **R003**

2. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.