



Environmental Protection Agency

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

5/15/2012

Lisa Smith  
Creative Products Inc  
1420 Kiewetter St  
Holland, OH 43528

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

Facility ID: 0448002090  
Permit Number: P0109244  
Permit Type: Renewal  
County: Lucas

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
TDES; Michigan; Indiana; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Creative Products, Inc. is a facility located in Holland, Ohio (Lucas County) that manufactures artificial marble used typically for counter top construction. This material is a composite of catalyzed thermoset polyester resins and fillers which give the desired physical characteristics. The principle emission of concern is the styrene emitted as an un-reacted polymer. The facility has 8 sources of emissions: one spray booth used to apply a gel coat to the molds (R001) and 7 mixers (P001-P007). The mixers are linked to a pouring and molding process, however, since this manufacturer uses a closed molding process, the bulk of the emissions are treated as if they are from the mixer only.

This permit is a renewal of the existing permits to operate which expire May 30, 2012. The permit language is updated to remove applicability of the obsolete OAC rule 3745-21-07 requirements and to update all other current permit writing policies of the Ohio EPA.

3. Facility Emissions and Attainment Status:

Facility-wide individual HAPs are restricted to 9.5 tons per year and facility-wide combined HAPs emissions are restricted to 24.5 tons per year. This federally enforceable facility-wide HAPs restriction will allow Creative Products to remain a minor source status for HAPs and exempt from MACT (40 CFR 63, Subpart WWWW) requirements.

Lucas County is designated attainment for all criteria pollutants.

4. Source Emissions:

Annual VOC emissions limitations for each emissions unit are as follows: R001 – 7.3 tons, P001 – 2.1 tons, P002-P004 – 3.5 tons each, and P005-P007 – 7.3 tons each. The annual particulate limit for R001 is 0.80 ton. Monitoring, recordkeeping, and reporting requirements are included in each permit to ensure enforceability of the individual emission unit limitations.

The 2009 FER indicated total actual emissions of 0.89 tpy VOCs and 0.01 tpy PE. The 2010 FER indicated reportable actual emissions were less than the reporting requirements.

5. Conclusion:

This FEPTIO renewal is non-controversial and should be issued draft-final.



6. Please provide additional notes or comments as necessary:

OEPA no longer regulates organic compound (OC) emissions under OAC rule 3745-21 and references to OC formerly established under OAC rule 3745-21-07 have been updated to VOC. Only non-VOC containing clean up materials are allowed. Effective September 19, 2011, a new version of OAC rule 3745-21-07 became effective and the new rule does not apply to this facility. All references to OAC rule 3745-21-07 and any applicable emission limitations, operating restrictions, and monitoring, recordkeeping, and reporting requirements have been removed in this FEPTIO. The emissions limitations for resin mixing and molding will be updated to VOC emissions in accordance with the current policies of the OEPA. The permittee has committed to using "exempt" materials for cleanup that do not contain VOCs therefore the facility-wide 20 tpy OC limit on cleanup materials, established under the previous BAT in PTI 04-01237, issued 11/29/2001, has been removed. At the time the initial PTI was written, OC emission limitations for mixers, molding, and gelcoat were established under OAC rule 3745-21-07(G)(2) and maximum allowable OC emissions were 8 pounds per hour, 40 pounds per day, and 7.3 tpy.

In the 2001 permit, the facility accepted a restriction on styrene to avoid MACT applicability. To clarify the restriction, this permit has been modified to include OEPA's standardized language and the HAPs limitation has been set at 9.5 tpy (individual) and 24.5 tpy (combined). This limit includes all styrene and all other HAPs in the gelcoat, resins, catalysts, mold release agents.

### **Emissions Factors**

Creative Products elected to receive a 9.5 tons individual and 24.5 tons combined HAPs (styrene) per rolling, 12-month summation emission restriction to avoid being subject to a composite manufacturer MACT. The calculations were based on the latest estimation methodology recommended by the Composites Fabricators Association (CFA) (September, 2001), e.g. Unified Emission Factor (UEF). The source also suggests that AP-42 emissions factors for non-opening molding processes were still valid (1 to 3% of the weight of styrene monomer in the resin, Table 4.12-2 dated 9/88). This varied from the US EPA AP-42 website guidance which vacated the emissions factors of AP-42 and recommended the formulation utilized in the development of PTI 03-08793. The formulas of that PTI were taken from an earlier CFA guidance document. It was assumed that the more recent CFA emissions factors (UEF) were the correct ones to use. However, as of September 2001, the time the synthetic minor determination was prepared, the latest version of the CFA guidance documents also included a statement that emissions factors for closed molding operations reduce overall styrene emissions to 50% of a similar open molding operation. The molding emissions were evaluated by both the AP-42 factor and by the CFA guidance to test for equivalence.

PTI 04-01237 issued 11/29/2001 assumed that emissions from the closed molding operation were attributed to the resin mixing operation, application, and roll-out. Fugitive dust from the mixing operation and minor amounts of adhesive, catalyst and mold release agent were also determined to be emitted. Because the fugitive particulate emissions were not vented from the building, they were not included in the permit. A review of the particulate BAT determination was not considered necessary at this time.

### **Background on Synthetic Minor Determination for PTI 04-01237 (issued 9/25/2001)**

A synthetic minor determination was prepared for PTI 04-01237, issued 9/25/2001. The facility requested federally enforceable limitations of 9.5 tons of individual and combined HAPs (styrene) per rolling, 12-month summation restriction to avoid being subject to a composite manufacturer MACT.



With this emission limitation on the gelcoat application, mixing and molding operations, and additional restrictions on the catalyst and cleanup materials, it was determined that this source had a potential to emit less than major source requirements for criteria pollutants or HAPs.

The MACT limitations for this process were no control with styrene monomer content restrictions of 44% for clear gelcoats, 30% for all other gelcoats, 18% for pigmented resins, and 33.5% for all other resins. The facility requested a limitation of 34% for "all other resins" in lieu of 33.5%. Since the MACT limitations were equivalent to BAT for practical purposes, we accepted the MACT limits as BAT. Operation of a spray booth filter for particulate was also required.

### **R001 – spray gelcoat application emissions**

It is assumed that in the gelcoat application, all VOCs will be emitted as styrene. Therefore, emissions were calculated based on a styrene emission factor and will be considered VOC emissions. The maximum gelcoat usage was reported as 25 pounds of gelcoat per hour with a maximum styrene content of 44%. The CFA unit emission factor (UEF) for the gelcoat application of this resin was 522 pounds of styrene per ton of a 44% styrene gelcoat processed.

Resin:

$25 \text{ lb gelcoat/hr} * (522 \text{ lb styrene}/2,000 \text{ lb gelcoat}) = 6.5 \text{ lb styrene per hour PTE}$   
 $(6.5 \text{ lb styrene/hr} * 8760 \text{ hr/yr}) / 2,000 \text{ lb/ton} = 28.5 \text{ tpy styrene PTE}$

Catalyst:

$(25 \text{ lb gelcoat/hr}) * (0.27 \text{ lb VOC/lb catalyst}) * (0.02 \text{ lb catalyst/lb gelcoat}) = 0.135 \text{ lb per hour}$

Total Emissions:

$6.5 \text{ lb/hr} + 0.135 \text{ lb/hr} = 6.7 \text{ lb/hr}$

At the time the PTI was written, OAC rule 3745-21-07(G)(2) applied and maximum allowable OC emissions were 8 pounds per hour and 40 pounds per day. Therefore, the maximum allowable OC emissions of 40 lb/d and 7.3 tpy were established. References to the 40 lb/d will be removed from the permit renewal, but because the 7.3 tpy was established under BAT and BAT will not be re-evaluated unless requested by the permittee, and the emission limitation will remain as 7.3 tpy as VOC.

Potential particulate emissions were calculated by multiplying the maximum usage rate of 25 pounds coating per hour by the maximum % solids (1-0.44) by the transfer efficiency (1-0.35) times the control efficiency of the dry filtration system (1-0.98) = 0.18. The annual emission limitation was determined by multiplying the hourly emission rate by 8,760 hours per year and dividing by 2,000 lb/t = 0.80 tpy.



**P001-P007 - mixers and associated closed molding processes emissions**

Emissions for the mixers were based on maximum resin usage per batch, allowing for 30 minutes per batch (i.e. 2 batches per hour) with a maximum styrene content of 34%. AP-42 is 3% of the 34% styrene weight (20.4 pounds of styrene per ton of resin).

Emissions Unit ID	(A) 30 min per batch = 2 batches per hour	(B) Lb resin/batch	(C) AP-42 assumes 3% of the styrene is emitted per lb in the resin = 0.03	(D) Maximum 34% styrene = 0.34 lb styrene/lb resin	(E) 98% resin addition rate per batch = 0.98	(F) Lb/hr (A)*(B)*(C)*(D)*(E)	(G) A 27% VOC catalyst is added, used at a max. additive rate of 2% by weight with an assumption of 100% loss of VOC which should also be included in styrene emissions, i.e. (0.27)*(0.02)*(100) = 0.54	(H) Lb/hr VOC emissions (F)+(F)*(G)	tpy (H)*(8,760 hr/yr)/(2,000 lb/t)
P001		15				0.3		0.47	2.1
P002		25				0.5		0.79	3.5
P003		25				0.5		0.79	3.5
P004		25				0.5		0.79	3.5
P005		92.5				1.9		2.9	Max. 40 lb/d*8,760 hr/yr ÷2,000 lb/ton = 7.3
P006		92.5				1.9		2.9	
P007		114				2.3		3.6	

Potential to emit:  
 P001

Resin addition @ 34% styrene content with 3% styrene emitted per pound resin with 98% of the batch being added is resin:

$$(15 \text{ lb/hr}) * (0.98 \text{ lb resin/batch}) * (0.34 \text{ lb styrene/lb resin}) * (0.03 \text{ lb emitted/lb in the batch}) * (2 \text{ batches/hr}) = 0.3 \text{ lb/batch PTE}$$

Catalyst addition at 27% VOCs with a maximum additive rate of 2% with 100% loss of VOC

$$(0.31 \text{ lb/hr}) * (0.27) * (0.02) * (100) = 0.17 \text{ lb/hr PTE}$$

Total emissions: 0.3 lb/hr + 0.17 lb/hr = 0.47 lb/hr

$$\text{Total PTE: } (0.47 \text{ lb/hr}) * (8,760 \text{ hr/yr}) / (2,000 \text{ lb/t}) = 2.1 \text{ tpy PTE}$$

As indicated in the Table, for P005-P007, because OAC rule 3745-21-07(G)(2) restricted the operations to 8 lb/h and 40 lb/d, the annual emissions limits were set at 7.3 tpy. Because the tpy was set as BAT and BAT is not being re-evaluated under this permit renewal, the emissions limitation will remain at 7.3 tpy even though OAC rule 3745-21-07(G)(2) no longer applies.

NOTE: this FEPTIO renewal adjusts the VOC short term limitations for P001-P004 and the PE short term limitation for R001 to account for errors in rounding. This does not affect the overall emissions for the facility.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.80
VOC	27.2
individual HAPs	9.5
Combined HAPs	24.5



PUBLIC NOTICE

5/15/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Creative Products Inc

1420 Kieswetter St,

HOLLAND, OH 13767

Lucas County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0109244

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO Renewal of P001-P007, R001: mixers and closed molding process.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Creative Products Inc**

Facility ID:	0448002090
Permit Number:	P0109244
Permit Type:	Renewal
Issued:	5/15/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Creative Products Inc

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 14
1. P001, Mixer 50-1..... 15
2. P007, Mixer 300-1..... 19
3. R001, Gelcoat Spray Booth..... 23
4. Emissions Unit Group -100 lb mixers: P002,P003,P004,..... 31
5. Emissions Unit Group -250 lb mixers: P005,P006,..... 35



## Authorization

Facility ID: 0448002090  
Application Number(s): A0043407, A0044319  
Permit Number: P0109244  
Permit Description: FEPTIO Renewal of P001-P007, R001: mixers and closed molding process.  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/15/2012  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Creative Products Inc  
1420 Kieswetter St  
HOLLAND, OH 13767

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

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

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109244

Permit Description: FEPTIO Renewal of P001-P007, R001: mixers and closed molding process.

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Mixer 50-1
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Mixer 300-1
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	Gelcoat Spray Booth
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable

**Group Name: 100 lb mixers**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Mixer 100-1
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Mixer 100-2
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Mixer 100-3
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable

**Group Name: 250 lb mixers**

<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Mixer 250-1
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Mixer 250-2
Superseded Permit Number:	P0088063
General Permit Category and Type:	Not Applicable

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

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

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

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

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

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

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

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

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

B.3.
2. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.5 tons per year for any single HAP and 24.5 tons per year for any combination of HAPs.
  - a) The permittee shall maintain records of the facility's actual emissions for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date monthly HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.
3. The combined styrene emissions from all emissions units located at this facility shall not exceed 345.6 pounds per day.
  - a) **Styrene emissions**
    - (1) The permittee shall collect and record the following information daily for the purpose of determining compliance with the styrene emission limitation from gelcoats, resins and catalysts as employed, for all emissions units facility-wide:
      - a. the name and identification of each gelcoat employed;
      - b. the total quantity of each gelcoat utilized per day, in pounds;
      - c. the styrene content of each gelcoat, in lb styrene /lb gelcoat;
      - d. the styrene emissions factor for each gelcoat as specified in the CFA unified emission factor (UEF) for open molding of composites, dated 7/01, in pounds of styrene per 2000 pounds of gelcoat processed;
      - e. the daily styrene emission rate for each gelcoat, calculated as the summation of the total pounds of each gelcoat employed multiplied by the styrene emissions factor for that gelcoat specified in the CFA unified emission factor (UEF) for open molding of composites, dated 7/01, i.e. (b. x d.), in pounds per day;
      - f. the name and identification of each resin employed;
      - g. the total quantity of each resin utilized per day, in pounds;
      - h. the styrene content of each resin, in lb styrene/lb resin;

- i. the daily styrene emission rate for each resin, calculated as the summation of the total pounds of each resin employed multiplied by the styrene content of that resin and by an emission factor of 3% by weight (AP-42, Table 4.4-2 dated 2/07), i.e. (g. x h. x 0.03), in pounds per day;
  - j. the name and identification of each catalyst employed;
  - k. the total quantity of each catalyst utilized per day, in pounds;
  - l. the styrene content of each catalyst, in lb styrene /lb catalyst;
  - m. the daily styrene emission rate for each catalyst, calculated as the summation of the total pounds of each catalyst employed multiplied by the styrene content of that catalyst and by an emission factor of 3% by weight (AP-42, Table 4.4-2 dated 2/07), i.e. (k. x l. x 0.03), in pounds per day;
  - n. the total daily styrene emissions calculated as a summation of e., i. and m. for all styrene emissions from all gelcoats, resins and catalysts, in pounds per day.
- (2) Styrene air toxics modeling for all emissions units at this facility:

The FEPTIO application for all emissions unit(s) at this facility was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., [8] hours per day and [5] days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
- d.  $TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$
- e. The following summarizes the results of dispersion modeling for the significant toxic contaminants or [worst case] toxic contaminant(s):

Toxic Contaminant: styrene monomer

TLV (mg/m<sup>3</sup>): 85,200

Maximum Hourly Emission Rate (lbs/hr): 14.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,979

MAGLC (ug/m<sup>3</sup>): 2,028

The permittee, having demonstrated that emissions of styrene, from emissions unit(s) P001, P002, P003, P004, P005, P006, P007, and R001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the [Toxic Air Contaminant Statute], ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the [Toxic Air Contaminant Statute], ORC 3704.03(F), 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 a non-restrictive change to a parameter or process operation, where compliance with the [Toxic Air Contaminant Statute], ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the [Toxic Air Contaminant Statute]:
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the [Toxic Air Contaminant Statute], ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the [Toxic Air Contaminant Statute], ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the [Toxic Air Contaminant Statute], ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the [Toxic Air Contaminant Statute], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (6) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director, in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model that was used to maintain compliance with the [Toxic Air Contaminant Statute], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - a) an identification of each month during which:
    - (1) the facility-wide emissions of individual HAPs exceeded 9.5 tons per rolling 12-month period, and the actual 12-month summation of individual HAPs emissions for each month; and
    - (2) the facility-wide emissions of combined HAPs exceeded 24.5 tons per rolling 12-month period, and the actual 12-month summation of combined HAPs emissions for each month.
    - (3) If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

**1. P001, Mixer 50-1**

**Operations, Property and/or Equipment Description:**

50 pound capacity resin, pigment and filler mixer (50-1).

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and f)(1)d.

(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. b)(1)b. and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01237, issued 9/25/2001)	emissions of volatile organic compounds (VOC) shall not exceed 0.47 pound per hour and 2.1 tons per year from resin molding and mixing  see b)(2)a.
b.	OAC rule 3745-31-05(D)	see b)(2)b.
c.	OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

a. In accordance with the permit application, the permittee has committed to the following:

i. a maximum 18% VOC by weight for all pigmented resins used in the veining process;

ii. a maximum 34% VOC by weight for all other polyester resins; and

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

iii. the use of only “exempt solvents” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.

b. Facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 9.5 tons individual HAPs and 24.5 tons combined of HAPs as a rolling, 12-month summation.

These emission limitations were established for PTI purposes to avoid major source applicability with additional recordkeeping and/or reporting requirements as included in Part B. Facility-wide Terms and Conditions, B.2.

c. Facility-wide emissions of styrene shall not exceed 345.6 pounds per day, as made enforceable by recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions, B.3.

c) Operational Restrictions

(1) The permittee shall only use “exempt solvent” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information daily for this emissions unit:

a. the name and identification of each resin and catalyst employed;

b. the VOC content of each resin and catalyst, in pounds per ton, as applied;

c. the weight of each resin and catalyst applied, in tons;

d. the total daily VOC emissions, calculated as a summation of b. times c. for each resin and catalyst employed, in pounds per day, assuming a 100% emission rate for each catalyst and a VOC emission rate for each resin (as styrene) evaluated using an emission factor of 3% by weight (AP-42, Table 4.12-2 dated 9/88, assuming all VOCs are emitted as styrene);

e. the total number of hours the emissions unit was in operation;

f. the average hourly VOC emission rate for the resin and catalyst, i.e., d./e., in pounds per hour (average).

[Note: The information must be for the resin as employed, including any catalysts and thinning solvents added at the emissions unit.]

(2) For each day during which the permittee uses cleanup material other than exempt solvent, the permittee shall maintain a record of the type and quantity used as cleanup material.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following:
  - a. any exceedances of the emissions limitations established under this permit;
  - b. any periods of time that a noncomplying resin (i.e., for weight fraction of styrene monomer) was employed;
  - c. any periods of time that a cleanup material containing HAPs was employed;
  - d. utilization of a cleanup material other than an exempt solvent.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.47 pound of VOC per hour from resin mixing and molding.

Applicable Compliance Method

This emissions limitation was established to reflect the one-time worst-case calculation for this emissions unit: the maximum usage rate of 30 pounds of resin and catalyst per hour, the 34% maximum styrene monomer weight percent allowed under the restrictions of this permit, and a maximum catalyst VOC concentration of 27%, and a maximum additive rate of 2%, calculated using the equations in condition d)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation

2.1 tons of VOC per year from resin mixing and molding.

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.47 pound of VOC per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

c. Emission Limitation

9.5 tons individual and 24.5 tons combined HAPs as a rolling, 12-month summation facility-wide.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission Limitation

facility-wide styrene emissions of 345.6 pounds per day

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

**2. P007, Mixer 300-1**

**Operations, Property and/or Equipment Description:**

300 pound capacity resin, pigment and filler mixer (300-1).

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and f)(1)d.

(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. b)(1)b. and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01237, issued 9/25/2001)	emissions of volatile organic compounds (VOC) shall not exceed 3.6 pounds per hour and 7.3 tons per year from resin molding and mixing  see b)(2)a.
b.	OAC rule 3745-31-05(D)	See b)(2)b.
c.	OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

a. In accordance with the permit application, the permittee has committed to the following:

i. a maximum 18% VOC by weight for all pigmented resins used in the veining process;

ii. a maximum 34% VOC by weight for all other polyester resins; and

iii. the use of only “exempt solvents” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.

b. Facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 9.5 tons individual HAPs and 24.5 tons combined of HAPs as a rolling, 12-month summation.

These emission limitations were established for PTI purposes to avoid major source applicability with additional recordkeeping and/or reporting requirements as included in Part B. Facility-wide Terms and Conditions, B.2.

c. Facility-wide emissions of styrene shall not exceed 345.6 pounds per day, as made enforceable by recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions, B.3.

c) Operational Restrictions

(1) The permittee shall only use “exempt solvent” as defined under OAC rule 3745-21-01(B) for use as a cleanup material in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information daily for this emissions unit:

a. the name and identification of each resin and catalyst employed;

b. the VOC content of each resin and catalyst, in pounds per ton, as applied;

c. the weight of each resin and catalyst applied, in tons;

d. the total daily VOC emissions, calculated as a summation of b. times c. for each resin and catalyst employed, in pounds per day, assuming a 100% emission rate for each catalyst and a VOC emission rate for each resin (as styrene) evaluated using an emission factor of 3% by weight (AP-42, Table 4.12-2 dated 9/88, assuming all VOCs are emitted as styrene);

e. the total number of hours the emissions unit was in operation;

f. the average hourly VOC emission rate for the resin and catalyst, i.e., d./e., in pounds per hour (average).

[Note: The information must be for the resin as employed, including any catalysts and thinning solvents added at the emissions unit.]

(2) For each day during which the permittee uses cleanup material other than exempt solvent, the permittee shall maintain a record of the type and quantity used as cleanup material.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following:
  - a. any exceedances of the emissions limitations established under this permit;
  - b. any periods of time that a noncomplying resin (i.e., for weight fraction of styrene monomer) was employed;
  - c. any periods of time that a cleanup material containing HAPs was employed;
  - d. utilization of a cleanup material other than an exempt solvent.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

3.6 pounds of VOC per hour from resin mixing and molding.

Applicable Compliance Method

This emissions limitation was established to reflect the one-time worst-case calculation for this emissions unit: the maximum usage rate of 228 pounds of resin and catalyst per hour, the 34% maximum styrene monomer weight percent allowed under the restrictions of this permit, and a maximum catalyst VOC concentration of 27%, and a maximum additive rate of 2%, calculated using the equations in condition d)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

b. Emission Limitation

7.3 tons of VOC per year from resin mixing and molding.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of d)(1) of this permit

c. Emission Limitation

9.5 tons individual and 24.5 tons combined HAPs as a rolling, 12-month summation facility-wide.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission Limitation

facility-wide styrene emissions of 345.6 pounds per day

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

**3. R001, Gelcoat Spray Booth**

**Operations, Property and/or Equipment Description:**

Gelcoat spray booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)f. and f)(1)h.
  - (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. b)(1)b. and f)(1)g.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01237, issued 9/25/2001)	emissions of volatile organic compounds (VOC) shall not exceed 6.7 pounds per hour and 7.3 tons per year from gelcoat application  particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.18 pound per hour and 0.80 ton per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	See b)(2)c.
c.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
f.	OAC rule 3745-114-01	See b)(2)d.

(2) Additional Terms and Conditions

- a. In accordance with the permit application, the permittee has committed not to exceed the following:
  - i. 44% VOC by weight for clear gelcoats;
  - ii. 30% VOC by weight for all other gelcoats; and
  - iii. the use of only “exempt solvents” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.

b. The hourly and annual particulate emission limitations were established for PTI purposes to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 98% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.

c. Facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 9.5 tons individual HAPs and 24.5 tons combined of HAPs as a rolling, 12-month summation.

These emission limitations were established for PTI purposes to avoid major source applicability with additional recordkeeping and/or reporting requirements as included in Part B. Facility-wide Terms and Conditions, B.2.

d. Facility-wide emissions of styrene shall not exceed 345.6 pounds per day, as made enforceable by recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions, B.3.

c) Operational Restrictions

- (1) The permittee shall only use “exempt solvent” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.
- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information for this emissions unit:
  - a. the name and identification of each gelcoat (resin and catalyst) employed;
  - b. the VOC content of each gelcoat, in pounds per ton, as applied;
  - c. the weight of each gelcoat applied, in tons;
  - d. the total daily VOC emissions, calculated as a summation of b. times c. for each resin and catalyst employed, in pounds per day, assuming a 100% VOC loss for the catalyst and a VOC emission rate for each gelcoat, in pounds of VOC (as styrene) per ton of gelcoat processed, evaluated using Table 3 Unified Emission Factor (UEF) Table, page 20 of "Technical Discussion of the Unified Emissions Factors for Open Molding of Composites" by R. Haberlein, Engineering Environmental Consulting Services, dated April 7, 1999 and supplied by the Composites Fabricators Association, (e.g., 522 pounds of styrene per ton of a 44% styrene gelcoat);
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly VOC emission rate for the gelcoat, i.e., d./e., in pounds per hour (average).

[Note: The gelcoat information must be for the resin as employed, including any catalysts and thinning solvents added at the emissions unit.]

- (2) For each day during which the permittee uses cleanup material other than exempt solvent, the permittee shall maintain a record of the type and quantity used as cleanup material.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated

according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (3) The permittee shall identify in the annual permit evaluation report:
  - a. any exceedances of the emissions limitations established under this permit;
  - b. any periods of time that a noncomplying gelcoat (i.e., for weight fraction of styrene monomer) was employed;
  - c. any periods of time that a cleanup material containing HAPs was employed;
  - d. any periods of time that the gelcoats utilized exceed the VOC content limitations;
  - e. utilization of a cleanup material other than an exempt solvent;
  - f. any periods of time when the dry filtration system was not in service when this emissions unit was in operation; and
  - g. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission limitation:

0.18 pound per hour of PE.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the maximum usage rate of 25 pounds coating per hour by the maximum % solids (1-0.44) by the transfer efficiency (1-0.35) times the control efficiency of the dry filtration system (1-0.98).

If required, compliance shall be demonstrated through stack testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

0.80 ton per year of PE.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.18 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission Limitation

6.7 pounds of VOC per hour from gelcoat application.

Applicable Compliance Method

This emissions limitation was established to reflect the one-time worst-case calculation for this emissions unit: the maximum usage rate of 25 pounds of resin and catalyst per hour, the 44% maximum styrene monomer weight percent allowed under the restrictions of this permit, and a maximum catalyst VOC concentration of 27%, and a maximum additive rate of 2%, calculated using the equations in condition d)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission Limitation

7.3 tons of VOC per year from gelcoat application.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of d)(1) of this permit

g. Emission Limitation

9.5 tons individual and 24.5 tons combined HAPs as a rolling, 12-month summation facility-wide.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

h. Emission Limitation

facility-wide styrene emissions of 345.6 pounds per day

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

**4. Emissions Unit Group -100 lb mixers: P002,P003,P004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P002	100 pound capacity resin, pigment and filler mixer (100-1).
P003	100 pound capacity resin, pigment and filler mixer (100-2).
P004	100 pound capacity resin, pigment and filler mixer (100-3).

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and f)(1)d.

(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. b)(1)b. and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01237, issued 9/25/2001)	emissions of volatile organic compounds (VOC) shall not exceed 0.79 pound per hour and 3.5 tons per year from resin molding and mixing for each emissions unit  see b)(2)a.
b.	OAC rule 3745-31-05(D)	See b)(2)b.
c.	OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

a. In accordance with the permit application, the permittee has committed not to exceed the following:

i. 44% VOC by weight for clear gelcoats;

- ii. 30% VOC by weight for all other gelcoats; and
- iii. the use of only “exempt solvents” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.

- b. Facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 9.5 tons individual HAPs and 24.5 tons combined of HAPs as a rolling, 12-month summation.

These emission limitations were established for PTI purposes to avoid major source applicability with additional recordkeeping and/or reporting requirements as included in Part B. Facility-wide Terms and Conditions, B.2.

- c. Facility-wide emissions of styrene shall not exceed 345.6 pounds per day, as made enforceable by recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions, B.3.

c) Operational Restrictions

- (1) The permittee shall only use “exempt solvent” as defined under OAC rule 3745-21-01(B) for use as a cleanup material in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emissions unit:
  - a. the name and identification of each resin and catalyst employed;
  - b. the VOC content of each resin and catalyst, in pounds per ton, as applied;
  - c. the weight of each resin and catalyst applied, in tons;
  - d. the total daily VOC emissions, calculated as a summation of b. times c. for each resin and catalyst employed, in pounds per day, assuming a 100% emission rate for each catalyst and a VOC emission rate for each resin (as styrene) evaluated using an emission factor of 3% by weight (AP-42, Table 4.12-2 dated 9/88, assuming all VOCs are emitted as styrene);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly VOC emission rate for the resin and catalyst, i.e., d./e., in pounds per hour (average).

[Note: The information must be for the resin as employed, including any catalysts and thinning solvents added at the emissions unit.]

- (2) For each day during which the permittee uses cleanup material other than exempt solvent, the permittee shall maintain a record of the type and quantity used as cleanup material.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following:
  - a. any exceedances of the emissions limitations established under this permit;
  - b. any periods of time that a noncomplying resin (i.e., for weight fraction of styrene monomer) was employed;
  - c. any periods of time that a cleanup material containing HAPs was employed;
  - d. utilization of a cleanup material other than an exempt solvent.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.79 pound of VOC per hour from resin mixing and molding.

Applicable Compliance Method

This emissions limitation was established to reflect the one-time worst case calculation for this emissions unit: the maximum usage rate of 50 pounds of resin and catalyst per hour, the 34% maximum styrene monomer weight percent allowed under the restrictions of this permit, and a maximum catalyst VOC concentration of 27%, and a maximum additive rate of 2%, calculated using the equations in condition d)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation

3.5 tons of VOC per year from resin mixing and molding.

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.79 pound of VOC per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

c. Emission Limitation

9.5 tons individual and 24.5 tons combined HAPs as a rolling, 12-month summation facility-wide.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission Limitation

facility-wide styrene emissions of 345.6 pounds per day

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

**5. Emissions Unit Group -250 lb mixers: P005,P006,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P005	250 pound capacity resin, pigment and filler mixer (250-1).
P006	250 pound capacity resin, pigment and filler mixer (250-2).

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and f)(1)d.

(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. b)(1)b. and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01237, issued 9/25/2001)	emissions of volatile organic compounds (VOC) shall not exceed 2.9 pounds per hour and 7.3 tons per year from resin molding and mixing for each emissions unit  see b)(2)a.
b.	OAC rule 3745-31-05(D)	see b)(2)b.
c.	OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

a. In accordance with the permit application, the permittee has committed not to exceed the following:

i. 44% VOC by weight for clear gelcoats;

- ii. 30% VOC by weight for all other gelcoats; and
  - iii. the use of only “exempt solvents” as defined under OAC rule 3745-21-01(B)(8) for use as a cleanup material in this emissions unit.
- b. Facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 9.5 tons individual HAPs and 24.5 tons combined of HAPs as a rolling, 12-month summation.

These emission limitations were established for PTI purposes to avoid major source applicability with additional recordkeeping and/or reporting requirements as included in Part B. Facility-wide Terms and Conditions, B.2.

- c. Facility-wide emissions of styrene shall not exceed 345.6 pounds per day, as made enforceable by recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions, B.3.

c) Operational Restrictions

- (1) The permittee shall only use “exempt solvent” as defined under OAC rule 3745-21-01(B) for use as a cleanup material in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emissions unit:
  - a. the name and identification of each resin and catalyst employed;
  - b. the VOC content of each resin and catalyst, in pounds per ton, as applied;
  - c. the weight of each resin and catalyst applied, in tons;
  - d. the total daily VOC emissions, calculated as a summation of b. times c. for each resin and catalyst employed, in pounds per day, assuming a 100% emission rate for each catalyst and a VOC emission rate for each resin (as styrene) evaluated using an emission factor of 3% by weight of the total styrene processed (AP-42, Table 4.12-2 dated 9/88);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly VOC emission rate for the resin and catalyst, i.e., d./e., in pounds per hour (average).
  - g. the company identification of each mold release agent employed;

[Note: The information must be for the resin as employed, including any catalysts and thinning solvents added at the emissions unit.]

- (2) For each day during which the permittee uses cleanup material other than exempt solvent, the permittee shall maintain a record of the type and quantity used as cleanup material.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following:
  - a. any exceedances of the emissions limitations established under this permit;
  - b. any periods of time that a noncomplying resin (i.e., for weight fraction of styrene monomer) was employed;
  - c. any periods of time that a cleanup material containing HAPs was employed;
  - d. utilization of a cleanup material other than an exempt solvent.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

2.9 pounds of VOC per hour from resin mixing and molding.

Applicable Compliance Method

This emissions limitation was established to reflect the one-time worst-case calculation for this emissions unit: the maximum usage rate of 185 pounds of resin and catalyst per hour, the 34% maximum styrene monomer weight percent allowed under the restrictions of this permit, and a maximum catalyst VOC concentration of 27%, and a maximum additive rate of 2%, calculated using the equations in condition d)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey

**Draft Permit-to-Install and Operate**

Creative Products Inc

**Permit Number:** P0109244

**Facility ID:** 0448002090

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

stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation

7.3 tons of VOC per year from resin mixing and molding.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of d)(1) of this permit

c. Emission Limitation

9.5 tons individual and 24.5 tons combined HAPs as a rolling, 12-month summation facility-wide.

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission Limitation

facility-wide styrene emissions of 345.6 pounds per day

Applicable Compliance Method

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

g) Miscellaneous Requirements

(1) None.