



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
PAULDING COUNTY  
Application No: 03-09641  
Fac ID: 0363000035**

**CERTIFIED MAIL**

**DATE: 6/3/2008**

Al-Co Products  
John Kohler  
P O Box 74 485 Second St  
Latty, OH 45855-0074

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 200** 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, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO

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**PAULDING COUNTY**

**PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL 03-09641 FOR AN AIR CONTAMINANT SOURCE  
FOR **Al-Co Products****

On 6/3/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Al-Co Products**, located at **485 Second St. P O Box 74, Latty**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-09641:

**administrative modification - updated emissions information for polyester resin casting and gelcoat.**

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.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 03-09641**

Application Number: 03-09641  
Facility ID: 0363000035  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: AI-Co Products  
Person to Contact: John Kohler  
Address: P O Box 74 485 Second St  
Latty, OH 45855-0074

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**485 Second St. P O Box 74  
Latty, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification - updated emissions information for polyester resin casting and gelcoat.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

**AI-Co Products**

**Facility ID: 0363000035**

**PTI Application: 03-09641**

**Issued: To be entered upon final issuance**

**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 (i.e., postmarked) quarterly 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,

**AI-Co Products**

Facility ID: 0363000035

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Issued: To be entered upon final issuance

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 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**

**AI-Co Products****Facility ID: 0363000035****PTI Application: 03-09641****Issued: To be entered upon final issuance**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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	16.9

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P001) - Casting Operation - Polyester Resin (Manual Open Molding) (Administrative modification of PTI 03-9641 issued May 21, 1997- updated OC emission factor information)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.97 lb OC/hr, from casting operations  0.58 ton OC/month, 7.0 ton/yr, from cleanup operations (for emissions units P001 and R001, combined)  See section B.1.
OAC rule 3745-31-05(C)	9.9 tons organic compounds (OC) per rolling 12-month period, from casting and gelcoat operations (for emissions units P001 and R001 combined) (See section A.2.a)
OAC rule 3745-21-07(G)(2)	See sections A.2.b and d. See section B..2.

**2. Additional Terms and Conditions**

- 2.a Combined annual hazardous air pollutant (HAP) emissions resulting from the use of polyester resin materials in emissions units P001, R001, and R002, combined, shall not exceed 9.9 tons per rolling 12-month period for HAPs. (All OC is assumed to be HAPs)

This emissions unit has been in operation for over 12 months and, for the purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

- 2.b The hourly emission limitation specified by this rule is less stringent than the hourly and daily emission limitation established pursuant to OAC rule

Emissions Unit ID: **P001**

**Issued: To be entered upon final issuance**  
3745-31-05(A)(3).

**Issued: To be entered upon final issuance**

- 2.c** The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
  
- 2.d** On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

**B. Operational Restrictions**

- 1. The permittee shall not employ any cleanup material in this emissions unit that contains any HAPs. "HAPs" is defined in OAC rule 3745-31-01(WW).
  
- 2. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company name and identification for each resin employed;
  
  - b. the amount of each resin employed, in pounds;
  
  - c. the amount of OC (i.e. monomer), in percent by weight, of each resin employed;
  
  - d. the OC emission rate\* for each resin employed ["b" x "c" x 0.03], in pounds; and
  
  - e. the total OC emission rate for all the resins employed, in pounds (the sum of "d" for all resins).

Emissions Unit ID: P001

\* based on Composite Fabricators Association (CFA) emissions factors for closed molding (April 2003)

2. The permittee shall (in conjunction with the information required in C.1) collect and record the following information each month for emissions units P001 and R001, combined:
  - a. the total OC emission rate for all the resins /gelcoats employed, in pounds; and
  - b. the rolling, 12-month combined HAPs emissions (from resin /gelcoat operations), in tons.
3. The permittee shall calculate and record the following information each month, for emissions units P001 and R001, combined:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material or contains HAPs;
  - c. the quantity of each cleanup material employed, in gallons;
  - d. the OC content of each cleanup material employed, in pounds/gallon;
  - e. the OC emissions for each cleanup material employed © x d), in pounds; and
  - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds, converted to tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports for this emissions

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unit identify the following:

- a. all exceedances of the 0.58 tons OC /month (from cleanup); and
- b. all exceedances of the 9.9 tons OC (HAPs) per rolling, 12-month period.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days of the date of the daily record indicating non-compliance.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use any cleanup material containing HAP(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days of the date of the daily record indicating non-compliance.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
0.97 lb OC /hr

**Applicable Compliance Method:**

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established based on a maximum throughput of 98 lbs resin per hour, multiplied by a maximum styrene (OC monomer) content of 0.33 (33%), then multiplied by an emission factor of 0.03 (3%) (based on CFA emission factor).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

Emissions Unit ID: P001

- b. Emission Limitation:  
9.9 tons OC/HAPS /yr, from casting and gelcoat operations(for emissions units P001 and R001, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Section C.2 of this permit.

- c. Emission Limitations:  
0.58 ton OC /month, 7.0 ton /yr, from cleanup operations (for emissions units P001 and R001, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly emission limitation through the record keeping required in Section C.3 of this permit.

The annual allowable OC limitation was developed by multiplying the monthly limitation by a maximum operating schedule of 12 months, and then dividing by 2000. Therefore, if compliance is shown with the monthly limitation, compliance shall shown with the annual limitation.

2. Formulation data, or USEPA Method 24 or 311, shall be used to determine the monomer (OC) content of each resin/gelcoat, or the OC content of cleanup material.

## F. Miscellaneous Requirements

None

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

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

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

**Operations, Property, and/or Equipment - (R001) - Gelcoat Spray Booth (non-atomized spray) (Administrative modification of PTI 03-9641 issued May 21, 1997- updated OC emission factor information)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	5.8 lbs OC /hr, from gelcoat operations  0.58 ton OC /month, 7.0 ton /yr, from cleanup operations (for emissions units P001 and R001, combined)  See section A.2.c.  See section B.1.
OAC rule 3745-31-05(C)	9.9 tons organic compounds (OC) per rolling 12-month period, from casting and gelcoat operations (for emissions units P001 and R00,1 combined) (See section A.2.a)
OAC rule 3745-21-07(G)(2)	40 lbs OC /day, from gelcoat operations  See section A.2.b and d.  See section B.2.

**2. Additional Terms and Conditions**

- 2.a Combined annual hazardous air pollutant (HAP) emissions resulting from the use of polyester resin materials in emissions units P001 and R001, combined, shall not exceed 9.9 tons per rolling 12-month period for HAPs. (All OC is assumed to be HAPs)

This emissions unit has been in operation for over 12 months and, for the

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purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

- 2.b** The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- 2.d** On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

**B. Operational Restrictions**

- 1. The permittee shall not employ any cleanup material in this emissions unit that contains HAPs. "HAPs" is defined in OAC rule 3745-31-01(WW).
- 2. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company name and identification for each gelcoat employed;
  - b. the amount of each gelcoat employed, in pounds;



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- \* based on American Composites Manufacturers Association (ACMA) emissions factors (conservatively applied, for any monomer content for gelcoats)
2. The permittee shall (in conjunction with the information required in C.1) collect and record the following information each month for emissions units P001 and R001 combined:
    - a. the total OC emission rate for all the resins /gelcoats employed, in pounds; and
    - b. the rolling, 12-month combined HAPs emissions (from resin /gelcoat operations), in tons.
  3. The permittee shall calculate and record the following information each month, for emissions units P001 and R001, combined:
    - a. the company identification for each cleanup material employed;
    - b. documentation on whether or not each cleanup material employed is a photochemically reactive material or contains HAPs;
    - c. the quantity of each cleanup material employed, in gallons;
    - d. the OC content of each cleanup material employed, in pounds/gallon;
    - e. the OC emissions for each cleanup material employed © x d), in pounds; and
    - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds, converted to tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports for this emissions

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unit identify the following:

- a. all exceedances of the 0.58 ton OC /month (from cleanup);
- b. all exceedances of the 9.9 tons OC (HAPs) per rolling, 12-month period; and
- c. all exceedances of the 40 lbs OC/day (from gelcoats).

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
5.8 lb OC /hr

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established based on a maximum throughput of 33 lbs resin per hour, multiplied by a maximum styrene (OC monomer) content of 0.50 (50%), then employed in the emissions equation  $\{33 \text{ lb gelcoat /hr} [0.4506 (0.50 \text{ lb OC /lb gelcoat}) - 0.0505]\}$  (based on ACMA emission factor).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

- b. Emission Limitation:  
9.9 tons OC/HAPs/yr, from casting and gelcoat operations (for emissions units P001 and R001, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Section C.2 of this permit.

- c. Emission Limitation:  
0.58 ton OC /month, 7.0 ton /yr, from cleanup operations (for emissions units

Emissions Unit ID: **R001**

P001 and R001, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly emission limitation through the record keeping required in Section C.3 of this permit.

The annual allowable OC limitation was developed by multiplying the monthly limitation by a maximum operating schedule of 12 months, and then dividing by 2000. Therefore, if compliance is shown with the monthly limitation, compliance shall be shown with the annual limitation.

- d. Emission Limitation:  
40 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Section C.1 of this permit.

2. Formulation data, or USEPA Method 24 or 311, shall be used to determine the monomer (OC) content of each resin /gelcoat, or the OC content of cleanup material.

**F. Miscellaneous Requirements**

None