State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
FAYETTE COUNTY
Application No: 01-07475

CERTIFIED MAIL

Y	**TOXIC REVIEW**
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 03/08/00

Cor Tec Company
Mark Smith
PO BOX 280
Washington CH, OH 43160

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **CDO**

FINAL PERMIT TO INSTALL 01-07475

Application Number:	01-07475
APS Premise Number:	0124010112
Permit Fee:	**$800**
Name of Facility:	Cor Tec Company
Person to Contact:	Mark Smith
Address:	PO BOX 280 Washington CH, OH 43160

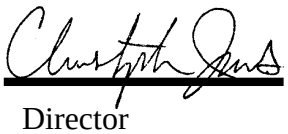
Location of proposed air contaminant source(s) [emissions unit(s)]:
2351 Kenskill Ave
Washington CH, **Ohio**

Description of proposed emissions unit(s):
Encor Process (P011), Trough Dryer #2 (P012) and modification to the GelCoater (R001).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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 thirty (30) 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

Pollutant	Tons Per Year
OC	39.2
PM	.42

Part II -Facility Specific Terms and Conditions

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: Styrene

   TLV (mg/m3): 85,000

   Maximum Hourly Emission Rate (lbs/hr): See permitted emission limitations

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,887

   MAGLC (ug/m3): 2,036

   OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

   b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

   d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
gelcoating operation controlled with primary and secondary enclosures and a catalytic incinerator	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05	Organic compound emissions (from all gelcoats) shall not exceed 11.7 pounds per hour. Organic compound emissions (from cleanup materials) shall not exceed 3.0 pounds per hour. Organic compound emissions (from all gelcoats) shall not exceed 14.7 tons per year. Organic compound emissions (from cleanup materials) shall not exceed 13.1 tons per year. See A.I.2.b, A.I.2.c, and A.II.6 below.

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the provisions in OAC rule 3745-21-07(G) pursuant to OAC rule 3745-21-07(G)(9)(g) and the emission limitations established pursuant to OAC rule 3745-31-05.

2.b The catalytic incinerator controlling organic compound emissions from this emissions unit shall operate with a minimum control (destruction) efficiency of 90%.

2.c Organic compound emissions from this emissions unit shall be reduced overall by a minimum of 69.0%.

2.d The pound per hour organic compound emission limitation for the use of gelcoat (11.7 pounds per hour) represents the maximum restricted hourly emission rate; therefore, there are no additional record keeping or reporting requirements associated with this emission limitation.

2.e The secondary enclosure (as specified in Attachment A, with any modifications deemed necessary by the permittee) serving this emissions unit shall be employed whenever the emissions unit is in operation. The permittee shall not employ the powered roof ventilator in the secondary enclosure except to ensure that the styrene emission concentrations remain below the Permissible Exposure Limit required by OSHA.

II. Operational Restrictions

1. This emissions unit shall not operate more than 8 cycles per hour and shall not employ more than 480 pounds of gelcoat per hour. A cycle shall include all process steps from the lowering of the hood until the raising of the hood.

2. This emissions unit shall not employ more than 1,200,000 pounds of gelcoat per rolling, 12-month period.

3. The temperature of the exhaust gases at the inlet to the catalyst bed of the incinerator, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

4. Only acetone and/or dibasic ester consisting of 66% dimethyl glutarate, 17% dimethyl adipate, and 16.5% dimethyl succinate, by weight, shall be used as cleanup materials in this emissions unit.

5. The monomeric styrene content of the gelcoat utilized in this process shall not exceed 42%, by weight, as employed.

6. The permittee shall not employ more than 4 gallons of cleanup materials per day in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature immediately upstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

c. Number of cycles each hour.

d. The name and identification number of each gelcoat, as employed.

e. The number of pounds of each gelcoat employed.

f. The styrene content of each gelcoat employed, in percent by weight.

g. Number of pounds of all gelcoats employed each hour.

h. The total number of pounds of cleanup materials (acetone and/or dibasic ester) employed, in pounds per day.

i. The organic compound emission rate for all cleanup materials (acetone and/or dibasic ester), in pounds per day.

j. The total number of hours the emissions unit was in operation.

k. The average hourly organic compound emission rate for all cleanup materials, i.e., (i)/(j), in pounds per hour.

l. The number of gallons of cleanup materials employed each day.

3. The permittee shall collect and record the following information for each month:

a. The number of pounds of all gelcoats employed.

b. The rolling, 12-month summation of all gelcoats employed, in pounds.

c. The total uncontrolled organic compound emission rate for all gelcoats, in pounds or tons per month.

d. The total uncontrolled (fugitive) organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (c) * (1 - (capture efficiency/100)).

e. The calculated, controlled organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (c) * (capture efficiency/100) * (1 - (control efficiency/100)).

f. The total organic compound emission rate for all gelcoats employed, in pounds or tons per month, i.e., (d) + (e).

g. The total organic compound emission rate for all cleanup materials employed, in pounds or tons per month, i.e., the summation of the daily values from Section A.III.2.f.

IV. Reporting Requirements

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

   a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   b. Any hour during which more than 480 pounds of gelcoat were employed.

   c. Any hour during which this emissions unit was operated for more than 8 cycles.

   d. An identification of each day during which the average hourly organic compound emissions for all cleanup materials exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   e. All periods of time during which the monomeric styrene content of the gelcoat employed in this emissions unit exceeded 42%, by weight.

   f. An identification of each day during which more than 4 gallons of cleanup materials were employed.

2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The permittee shall submit annual reports which specify the total gelcoat usage, the total organic compound emissions from the use of gelcoat, and the total organic compound emissions from the use of cleanup materials from this emissions unit for the previous year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

V. Testing Requirements

1. The permittee shall conduct or have conducted, organic compound emission testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 90 days after the modification to this emissions unit is complete.

   b. The test(s) shall be conducted while this emissions unit and P011 are venting organic compound emissions to the catalytic incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office. The temperature immediately upstream of the incinerator's catalyst bed shall be continuously monitored and recorded during the emission test(s).

   c. The following test method(s) shall be employed to determine compliance with the overall control efficiency limitation for organic compound emissions:

   d. The capture efficiency shall be determined using methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

   e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

   g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request

additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

2. Emission Limitation: Organic compound emissions (from all gelcoats) shall not exceed 11.7 pounds per hour.

   Applicable Compliance Method: This emission limitation represents the maximum restricted hourly emission rate and was derived by summing the uncontrolled (fugitive) and controlled emissions for this emissions unit (8.8 and 2.9 pounds per hour, respectively). The uncontrolled (fugitive) and controlled emissions were based upon the maximum restricted amount of gelcoat applied per hour (480 pounds), an organic compound emission factor developed from emission testing (0.0789 pound per pound of gelcoat applied) and the capture and control efficiencies for the primary enclosure and catalytic incinerator (76.7 and 90 percent, respectively). Compliance shall be based upon the emission testing required above.

3. Emission Limitation: Organic compound emissions (from cleanup materials) shall not exceed 3.0 pounds per hour.

   Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III.2. The organic compound emission rate for the cleanup materials utilized in this process (acetone and/or dibasic ester) shall be based upon a summation of the organic compound emission rates for acetone and dibasic ester as determined in accordance with the following procedure. The usage rate of acetone shall be multiplied by the emission factor of 1.0 pound of acetone emitted per pound of acetone used. The usage rate of dibasic ester shall be multiplied by the emission factor of 0.00717 pound of dibasic ester emitted per pound of dibasic ester used.

4. Emission Limitation: Organic compound emissions (from all gelcoats) shall not exceed 14.7 tons per year.

   Applicable Compliance Method: Compliance shall be based upon a summation of the monthly records specified in Section A.III.3.f.

5. Emission Limitation: Organic compound emissions (from cleanup materials) shall not exceed 13.1 tons per year.

   Applicable Compliance Method: Compliance shall be based upon a summation of the monthly records specified in Section A.III.3.g.

6. The monomeric styrene content of the gelcoat utilized in this process shall be determined in accordance with the gelcoat supplier's MSDS sheets. If required, the permittee shall conduct or have the gelcoat supplier conduct an analysis of any gelcoat employed in this emissions unit in accordance with 40 CFR Part 60, Appendix A, Method 24. When Method 24 is used, the weight percent monomer shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a discrepancy between the MSDS data and the analyses performed in accordance with 40 CFR Part 60, Appendix A, Method 24, the Method 24 data will take precedence.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
gelcoating operation controlled with primary and secondary enclosures and a catalytic incinerator	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Encor line controlled with a dust collection system, permanent total enclosure, and a catalytic incinerator	OAC rule 3745-31-05	Organic compound emissions shall not exceed 2.5 pounds per hour. Visible particulate emissions shall not exceed 10% opacity as a 6-minute average. Particulate emissions shall not exceed 0.10 pound per hour. Organic compound emissions shall not exceed 4.1 tons per year. Particulate emissions shall not exceed 0.42 ton per year. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(6) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified in these regulations are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

2.a Organic compound emissions from this emissions unit shall be reduced overall by a minimum of 90%.

2.b The permanent total enclosure (PTE) associated with this emissions unit shall be continuously maintained in such a manner as to meet the criteria established for a PTE in method 204 (40 CFR Part 51, Appendix M) when the emissions unit is in operation.

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The pressure drop across the dust collection system shall be maintained within the range of 2.0 to 8.0 inches of water while the emissions unit is in operation.

2. The temperature of the exhaust gases at the inlet to the catalyst bed of the incinerator, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. This emissions unit shall not employ more than 6,000,000 pounds of resin per year and 1,800 pounds of resin per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature immediately upstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the dust collection system while the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day:

   a. The amount of resin employed in this emissions unit, in pounds.

   b. The company identification for each resin employed.

c. The number of gallons of each resin employed.

d. The organic compound content of each resin, in pounds per gallon.

e. The total controlled organic compound emission rate for all resins, in pounds or tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all resins, i.e., (e)/(f), in pounds per hour.

h. The average hourly resin usage rate for all resins, i.e., (a)/(f), in pounds per hour.

i. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

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

   a. Any hour during which more than 1800 pounds of resin were employed.

   b. An identification of each day during which the average hourly organic compound emissions exceeded 2.5 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   c. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

2. All periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.

3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall also submit annual reports which specify the total organic compound emissions, the total particulate emissions, and the resin usage from this emissions unit for the previous calendar

year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

V. Testing Requirements

1. The permittee shall conduct or have conducted, organic compound emission testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 90 days after the modification to emissions unit R001 is complete.

   b. The organic compound emission test(s) shall be conducted while this emissions unit and R001 are venting to the catalytic incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office. The temperature immediately upstream of the incinerator's catalyst bed shall be continuously monitored and recorded during the emission test(s).

   c. The pressure drop across the dust collection system shall be continuously monitored and recorded periodically during the emission test(s).

   d. The following test method(s) shall be employed to determine the control efficiency for organic compounds:

   e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

   f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   g. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

   h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request

additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

2. Emission Limitation: Organic compound emissions shall not exceed 2.5 pounds per hour.

   Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III and the emission testing required above.

3. Emission Limitation: Particulate emissions shall not exceed 0.10 pound per hour.

   Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

4. Emission Limitation: Organic compound emissions shall not exceed 4.1 tons per year.

   Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III.

5. Emission Limitation: Particulate emissions shall not exceed 0.42 ton per year.

   Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III.

6. Emission Limitation: Visible particulate emissions shall not exceed 10% opacity as a 6-minute average.

   Applicable Compliance Method: Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

7. The organic content of the resins utilized in this process shall be determined in accordance with the resin supplier's MSDS sheets. If required, the permittee shall conduct or have the resin supplier conduct an analysis of any resin employed in this emissions unit in accordance with 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Encor line controlled with a dust collection system, permanent total enclosure, and a catalytic incinerator	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
trough drying Unit #2	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05	Organic compound emissions shall not exceed 7.3 tons per year.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the trough drying operation:

   a. The company identification for each resin and photochemically reactive cleanup material employed.

   b. The number of 8-foot troughs placed in the drying unit.

   c. The number of 10-foot troughs placed in the drying unit.

   d. The organic compound emission rate from the 8-foot troughs, in pounds per day, i.e., the value from (b) multiplied by the pound(s) of organic compounds per trough emission factor developed during the emission test that was conducted on April 14 and 15, 1993. The emission factor for the 8-foot trough was .298 pound of organic compounds per trough. If

a revised emission factor for the 8-foot troughs is developed pursuant to Section A.V.2, the revised emission factor shall supercede the emission factor established in April of 1993.

e. The organic compound emission rate from the 10-foot troughs, in pounds per day, i.e., the value from (c) multiplied by the pound(s) of organic compounds per trough emission factor developed during the emission test that was conducted on April 29 and 30, 1993. The emission factor for the 10-foot trough was .455 pound of organic compounds per trough. If a revised emission factor for the 10-foot troughs is developed pursuant to Section A.V.2, the revised emission factor shall supercede the emission factor established in April of 1993.

f. The number of gallons of each photochemically reactive cleanup material employed.

g. The organic compound content of each photochemically reactive cleanup material, in pounds per gallon.

h. The organic compound emission rate for all photochemically reactive cleanup materials employed, in pounds per day.

i. The total organic compound emission rate from the troughs and photochemically reactive cleanup materials, in pounds per day, i.e, the sum of (d), (e) and (h) above.

j. The total number of hours the emissions unit was in operation. ("Operation" shall mean the period of time when the first trough is placed in the trough drying unit until one hour after the last trough is placed in the trough drying unit.)

k. The average hourly organic compound emission rate for all troughs and photochemically reactive cleanup materials, i.e., (i)/(j), in pounds per hour (average).

2. The permittee shall collect and record the following information for the purpose of determining annual organic compound emissions:

a. The company identification for each nonphotochemically reactive cleanup material employed.

b. The number of gallons of each nonphotochemically reactive cleanup material employed.

c. The organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon.

d. The total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each day during which the average hourly organic compound emissions from the troughs and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the troughs and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

V. Testing Requirements

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

2. Emission Limitations: Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section A.III.1.

If required, by the Ohio EPA or USEPA, the permittee shall reestablish appropriate emission factors for the 8- and 10-foot troughs. The emission factors shall be determined using the trough gravimetric procedure as specified in Section 5.0 of the “Results of Gravimetric Testing for Emissions from Trough Drying Operations” prepared by Radian Corporation in April of 1993.

3. Emission Limitation: Organic compound emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
trough drying Unit #2	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None