

Facility ID: 1409040931 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 1409040931 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|---|
| gel coat booth | OAC rule 3745-31-05(A)(3) (PTI 14-05071) | 8 lbs OC/hr from coatings 40 lbs OC/day from coatings 8.86 lbs OC/day from cleanup materials 5.2 TPY OC from coatings 1.1 TPY OC from cleanup materials |
| | OAC rule 3745-21-07(G)(2) | See A.2. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). |

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the air toxics policy and emission limitations. The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The styrene content of the gel coat used shall not exceed 47 percent by weight.
2. The OC content of each cleanup material employed in this emissions unit shall not exceed 8.86 pounds of OC per gallon of cleanup material.
3. The amount of cleanup material used shall not exceed 1 gallon/day and 250 gallons/year.
4. The amount of gel coat used shall not exceed 15.49 gallons/day and 4160 gallons/year.
5. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:
 - a. The amount of gel coat used, in gallons.
 - b. The styrene content of the gel coat, in percent by weight.
 - c. The amount of cleanup material used, in gallons.
 - d. The OC content of the cleanup materials used, in pounds per gallon.
 - e. The daily OC emissions from gel coat calculated using the following equation:

$$OC \text{ emissions} = (a) \times (\text{gel coat density}) \times (.292^{**})$$

** The emission factor above is from the Composites Fabricators Association Open Molding Emission Model, dated 5/98 and is based on a gel coat with a 47% styrene content. When a gel coat with a lower styrene content is used, the appropriate emission factor for that gel coat should be applied. The emissions factors

are based on the styrene contents.

- f. The total organic compound emissions from cleanup materials, in pounds per day (c x d).
 - g. A record of cleanup material employed in this emissions unit, indicating whether or not the cleanup material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene
 TLV (ug/m³): 85,000
 Maximum Hourly Emission Rate (lbs/hr): 8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 664.3
 MAGLC (ug/m³): 2024

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

- 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the OC content of the cleanup materials employed exceeded 8.86 pounds of OC per gallon, and the actual OC content of the non-compliant cleanup materials employed.
 - c. An identification of each day during which the styrene content of the gel coat employed exceeded 47% by weight, and the actual styrene content of the non-compliant gel coat employed.
 - d. An identification of each day during which cleanup materials were employed that were photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).
 - 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations specified in terms B.3. and B.4.
 - 3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- E. Testing Requirements**

1. Compliance with the OC emission limitations specified in term A.1. of this permit shall be determined by the information collected and recorded in term C.1. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the styrene content limit and OC content of the cleanup materials in terms B.1 and B.2 shall be determined by the record keeping in term C.1.
4. Compliance with the material usage restrictions in terms B.3 and B.4 shall be demonstrated by the recordkeeping in term C.1.

F. **Miscellaneous Requirements**

None