

Facility ID: 0372030210 Issuance type: Title V Draft Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - 3.75 MMBTU/hr, natural gas fired space heater PFI# 1;
B002 - 1.25 MMBTU/hr, natural gas fired space heater PFI# 2;
B003 - 2.19 MMBTU/hr, natural gas fired space heater PFI# 3;
F001 - PVC resin conveying and storage;
P001 - Wood Saws;
P002 - PVC Grinder #1;
P003 - PVC Grinder #2;
P004 - PVC Grinder #3;
P005 - PVC resin conveying and storage;
P006 - Steel Welding;
P007 - Rail Welding Booth;
P008 - PVC extrusion #1;
P009 - PVC extrusion #2;
P010 - PVC extrusion #3;
P011 - PVC extrusion #4;
Z001 - PVC extrusion #5; and
Z002 - PVC Grinder #4.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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- [Go to Part III for Emissions Unit R001](#)
- [Go to Part III for Emissions Unit R002](#)
- [Go to Part III for Emissions Unit R003](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0372030210 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Conveyor and paint dip tank for painting metal parts.	OAC rule 3745-21-09 (U)(1)(d)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating (excluding water and exempt solvents)

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall only use complying coatings in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. Testing Requirements

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

Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section A.III. above. Also any determination of VOC content, solids content, or density of a coating shall be based on the coating as employed (as applied), including the addition of any thinner or viscosity reducer to the coating. The permittee shall determine the composition of each coating from formulation data supplied by the manufacturer of the coating or from data determined by a Reference Method 24 analysis of each coating, as received. The Ohio EPA may require the permittee, if formulation data supplied by the manufacturer is used, to determine the VOC content of the coatings by Reference Method 24 or an equivalent or alternative method.

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
Conveyor and paint dip tank for painting metal parts.	OAC rule 3745-31-05 PTI # 03-5440	64.2 pounds of VOC per day and 11.72 tons of VOC per year
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record for each day of operation the following information for each coating material employed in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the mass of VOC per volume of coating, in pounds VOC per gallon, of each coating, as applied;
 - c. the volume, in gallons, of each coating employed;
 - d. the amount of VOC emitted from each coating employed, in pounds; and
 - e. the total amount of VOC emitted from all coatings employed, in pounds.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, including the reporting of no deviations, in accordance with Section B.2.b. of Part I (General Terms and Conditions) of this permit, for daily VOC emission records that show an exceedance of the daily VOC limit specified in Section B.I. of Part III.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section B.I.1. of the Part III terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 64.2 pounds VOC per day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section B.III. and the coating data determinations specified in Section A.IV.
 - b. Emission Limitation: 11.72 tons VOC per year

Applicable Compliance Method: No compliance method is necessary because this annual emission limitation is based on the daily VOC emission limitation times 365 days per year. Therefore, compliance with the daily VOC emission limitation will ensure compliance with the annual limitation.

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0372030210 Emissions Unit ID: R001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
fiberglass/resin spray booth #1 (airless spray)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. (Also, see Section A.I.2.a. below.)
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE) per hour

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-07(G)(4), the emissions of organic materials from the cleanup of this emissions unit with photochemically reactive materials (i.e., photochemically reactive cleanup materials) shall be included with the other emissions of organic materials from this emissions unit for determining compliance with OAC rule 3745-21-07(G)(2).

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating (polyester resin and catalyst) and cleanup material employed;
 - b. the name and percent by volume of each organic chemical comprising the liquid organic material composition of each cleanup material and the classification status of each cleanup material as either a photochemically reactive material or a nonphotochemically reactive material;
 - c. the gallons of each coating employed and each photochemically reactive cleanup material employed;
 - d. the OC content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the catalyst content and the polyester resin content of each coating employed, in pounds of each per gallon;
 - f. the amount of catalyst and polyester resin for each coating employed, in pounds;
 - g. the total amount of catalysts and polyester resins for all coatings employed, in pounds;
 - h. the total OC emission rate for all coatings, in pounds OC per day;
 - i. the total OC emission rate for all photochemically reactive cleanup materials, in pounds OC per day;
 - j. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - k. the total number of hours the emissions unit was in operation; and
 - l. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (j)/(k), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section A.1.c.ii. of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly OC emission rate for the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emission rate for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
8 pounds OC per hour and 40 pounds OC per day

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials. Formulation data shall be used to determine the polyester resin content and catalyst content of the coatings. For cleanup materials, the daily OC emission rate (in pounds OC/day) is calculated as the OC content (in pounds OC per gallon of cleanup material) times the daily gallons of cleanup material employed. For coatings (polyester resins with catalyst), the daily OC emissions rate Et shall be calculated by utilizing the following equations provided by the coating material supplier:

$$E_t = E_s + E_c$$

$$E_s = (C + R)10\%$$

$$E_c = (C + R)6\%$$

where

E_t = total OC emissions rate, in pounds OC/day

E_s = OC emissions rate from spraying, in pounds OC/day

E_c = OC emissions rate from curing, in pounds OC/day

C = total daily rate of catalyst(s) employed, in pounds/day

R = total daily rate of polyester resin (styrene) employed, in pounds/day

(Note: A polyester resin with catalyst is not a typical coating in which 100% of its OC content is emitted. A portion of the OC content is not emitted and is chemically bound within the coating.)

- b. Emission Limitation:
20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

- c. Emission Limitation:
0.551 pound particulate emissions (PE) per hour

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the spraying operations:

$$E = \text{maximum coating solids usage rate for the spray stations in pounds per hour} \times (1-TE) \times (1-CE)$$

where

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (obtained from the application equipment manufacturer or from technical references), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030210 Emissions Unit ID: R001 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
fiberglass/resin spray booth #1 (airless spray)	OAC rule 3745-31-05 PTI # 03-6095	8 pounds of VOC per hour (excludes cleanup) 40 pounds of VOC per day (excludes cleanup) 7.6 tons of VOC per year (includes cleanup) (Also, see B.I.2.a., B.I.2.b., and B.I.2.c. below.)

2. **Additional Terms and Conditions**

- Resin usage in this emissions unit shall not exceed 12 gallons per hour and 60.53 gallons per day at a resin density of 9.17 pounds per gallon and a VOC content of 44%, by weight. Catalyst usage shall not exceed 0.38 gallon per hour and 1.92 gallons per day at a catalyst density of 8.34 pounds per gallon and a VOC content of 100%, by weight.
- Cleanup material usage in this emissions unit shall not exceed 1.5 tons/year (based on 456 gallons/year at 6.59 pounds VOC per gallon).
- The permittee shall not employ any cleanup material that is classified as a "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5).

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II. **Operational Restrictions**

- None

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III. **Monitoring and/or Record Keeping Requirements**

- The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC usage and annual VOC emissions for this emissions unit from cleanup:
 - the company identification for each cleanup material employed;
 - the monthly number of gallons of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds per gallon;
 - the monthly VOC usage for each cleanup material, in pounds; and
 - the total VOC usage for all cleanup materials, for the calendar year to date (end of month), in pounds or tons per year.

(Note: It is assumed that total VOC emissions for all cleanup materials is the same as total VOC usage for all cleanup materials.)
- The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from this emissions unit for coatings employed and cleanup:
 - the total VOC emissions for all coatings employed for the calendar month, in pounds or tons (based on a summation of daily OC emissions for coatings employed that are recorded under Section A.III.1. of these terms and conditions and a presumption that all OC emissions are VOC emissions except where otherwise documented pursuant to the definition of VOC);
 - the total VOC emissions for all cleanup materials employed for the calendar month, in pounds or tons (based on the data recorded under Section B.III.1. of these terms and conditions);
 - the total VOC emissions for all coatings and cleanup materials employed for the calendar month, in pounds or tons; and
 - the total VOC emissions for all coatings and cleanup materials employed for the calendar year to date (end of month), in pounds or tons per year.
- The permittee shall collect and record the following information for each day for this emissions unit:
 - hourly and daily total resin usage, in gallons;
 - resin density, pounds per gallon;
 - VOC content of resin, in percent by weight;
 - hourly and daily catalyst usage, in gallons;
 - catalyst density, in pounds per gallon; and
 - VOC content of catalyst, in percent by weight.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section B.2.b of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each hour and each day in which the resin usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily resin usage for each exceedance;
 - b. an identification of each resin in which the VOC content exceeded the VOC content limitation specified under Section B.1.2.a. of these terms and conditions, and the actual VOC content of such resin;
 - c. an identification of each hour and each day in which the catalyst usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily catalyst usage for each exceedance; and
 - d. an identification of each catalyst in which the density exceeded the density limitation specified under Section B.1.2.a. of these terms and conditions.
2. The permittee shall submit annual reports which specify for this emissions unit the total usage (and VOC emissions) of cleanup materials and the total VOC emissions from coatings and cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily records showing that a cleanup material classified as a photochemically reactive material was employed (see records under Sections A.III.1.b. and A.III.1.c.). The notification shall include a copy of such records and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emission limitations and material usage limitations in Section B.I. of these terms and condition shall be determined in accordance with the following method(s):
 - a. Material Usage Limitations:
Resin usage in this booth shall not exceed 12 gallons per hour and 60.53 gallons per day at a resin density of 9.17 pounds per gallon and a VOC content of 44%, by weight.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the resins.
 - b. Material Usage Limitations:
Catalyst usage shall not exceed 0.38 gallons per hour and 1.92 gallons per day at a catalyst density of 8.34 pounds per gallon and a OC content of 100%, by weight.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the catalysts.
 - c. Material Usage Limitation:
Cleanup material usage shall not exceed 1.5 tons/year (based on 456 gallons/year at 6.59 pounds VOC per gallon).

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the cleanup materials.
 - d. Emission Limitations:
8 pounds of VOC per hour, 40 pounds of VOC per day, and 7.6 tons of VOC per year

Applicable Compliance Method:
Compliance with the hourly, daily, and annual VOC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. and Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0372030210 Emissions Unit ID: R002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
fiberglass/resin spray booth #2 (airless spray)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. (Also, see Section A.I.2.a. below.)
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE) per hour

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-07(G)(4), the emissions of organic materials from the cleanup of this emissions unit with photochemically reactive materials (i.e., photochemically reactive cleanup materials) shall be included with the other emissions of organic materials from this emissions unit for determining compliance with OAC rule 3745-21-07(G)(2).

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1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating (polyester resin and catalyst) and cleanup material employed;
 - b. the name and percent by volume of each organic chemical comprising the liquid organic material composition of each cleanup material and the classification status of each cleanup material as either a photochemically reactive material or a nonphotochemically reactive material;
 - c. the gallons of each coating employed and each photochemically reactive cleanup material employed;
 - d. the OC content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the catalyst content and the polyester resin content of each coating employed, in pounds of each per gallon;
 - f. the amount of catalyst and polyester resin for each coating employed, in pounds;
 - g. the total amount of catalysts and polyester resins for all coatings employed, in pounds;
 - h. the total OC emission rate for all coatings, in pounds OC per day;
 - i. the total OC emission rate for all photochemically reactive cleanup materials, in pounds OC per day;
 - j. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - k. the total number of hours the emissions unit was in operation; and
 - l. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (j)/(k), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section A.1.c.ii. of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly OC emission rate for the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emission rate for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

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

- a. Emission Limitations:
8 pounds OC per hour and 40 pounds OC per day

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials. Formulation data shall be used to determine the polyester resin content and catalyst content of the coatings. For cleanup materials, the daily OC emission rate (in pounds OC/day) is calculated as the OC content (in pounds OC per gallon of cleanup material) times the daily gallons of cleanup material employed. For coatings (polyester resins with catalyst), the daily OC emissions rate Et shall be calculated by utilizing the following equations provided by the coating material supplier:

$$E_t = E_s + E_c$$

$$E_s = (C + R)10\%$$

$$E_c = (C + R)6\%$$

where

E_t = total OC emissions rate, in pounds OC/day

E_s = OC emissions rate from spraying, in pounds OC/day

E_c = OC emissions rate from curing, in pounds OC/day

C = total daily rate of catalyst(s) employed, in pounds/day

R = total daily rate of polyester resin (styrene) employed, in pounds/day

(Note: A polyester resin with catalyst is not a typical coating in which 100% of its OC content is emitted. A portion of the OC content is not emitted and is chemically bound within the coating.)

- b. Emission Limitation:
20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

- c. Emission Limitation:
0.551 pound particulate emissions (PE) per hour

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the spraying operations:

$$E = \text{maximum coating solids usage rate for the spray stations in pounds per hour} \times (1 - TE) \times (1 - CE)$$

where

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (obtained from the application equipment manufacturer or from technical references), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030210 Emissions Unit ID: R002 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
fiberglass/resin spray booth #2 (airless spray)	OAC rule 3745-31-05 PTI # 03-6095	8 pounds of VOC per hour (excludes cleanup) 40 pounds of VOC per day (excludes cleanup) 7.6 tons of VOC per year (includes cleanup) (Also, see B.I.2.a., B.I.2.b., and B.I.2.c. below.)

2. **Additional Terms and Conditions**

- a. Resin usage in this emissions unit shall not exceed 12 gallons per hour and 60.53 gallons per day at a resin density of 9.17 pounds per gallon and a VOC content of 44%, by weight. Catalyst usage shall not exceed 0.38 gallon per hour and 1.92 gallons per day at a catalyst density of 8.34 pounds per gallon and a VOC content of 100%, by weight.
- b. Cleanup material usage in this emissions unit shall not exceed 1.5 tons/year (based on 456 gallons/year at 6.59 pounds VOC per gallon).
- c. The permittee shall not employ any cleanup material that is classified as a "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5).

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC usage and annual VOC emissions for this emissions unit from cleanup:

- a. the company identification for each cleanup material employed;
 - b. the monthly number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the monthly VOC usage for each cleanup material, in pounds; and
 - e. the total VOC usage for all cleanup materials, for the calendar year to date (end of month), in pounds or tons per year.

(Note: It is assumed that total VOC emissions for all cleanup materials is the same as total VOC usage for all cleanup materials.)
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from this emissions unit for coatings employed and cleanup:
 - a. the total VOC emissions for all coatings employed for the calendar month, in pounds or tons (based on a summation of daily OC emissions for coatings employed that are recorded under Section A.III.1. of these terms and conditions and a presumption that all OC emissions are VOC emissions except where otherwise documented pursuant to the definition of VOC);
 - b. the total VOC emissions for all cleanup materials employed for the calendar month, in pounds or tons (based on the data recorded under Section B.III.1. of these terms and conditions);
 - c. the total VOC emissions for all coatings and cleanup materials employed for the calendar month, in pounds or tons; and
 - d. the total VOC emissions for all coatings and cleanup materials employed for the calendar year to date (end of month), in pounds or tons per year.
3. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. hourly and daily total resin usage, in gallons;
 - b. resin density, pounds per gallon;
 - c. VOC content of resin, in percent by weight;
 - d. hourly and daily catalyst usage, in gallons;
 - e. catalyst density, in pounds per gallon; and
 - f. VOC content of catalyst, in percent by weight.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section B.2.b of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each hour and each day in which the resin usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily resin usage for each exceedance;
 - b. an identification of each resin in which the VOC content exceeded the VOC content limitation specified under Section B.1.2.a. of these terms and conditions, and the actual VOC content of such resin;
 - c. an identification of each hour and each day in which the catalyst usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily catalyst usage for each exceedance; and
 - d. an identification of each catalyst in which the density exceeded the density limitation specified under Section B.1.2.a. of these terms and conditions.
2. The permittee shall submit annual reports which specify for this emissions unit the total usage (and VOC emissions) of cleanup materials and the total VOC emissions from coatings and cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily records showing that a cleanup material classified as a photochemically reactive material was employed (see records under Sections A.III.1.b. and A.III.1.c.). The notification shall include a copy of such records and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emission limitations and material usage limitations in Section B.I. of these terms and condition shall be determined in accordance with the following method(s):
 - a. Material Usage Limitations:

Resin usage in this booth shall not exceed 12 gallons per hour and 60.53 gallons per day at a resin density of 9.17 pounds per gallon and a VOC content of 44%, by weight.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the resins.

b. Material Usage Limitations:
Catalyst usage shall not exceed 0.38 gallons per hour and 1.92 gallons per day at a catalyst density of 8.34 pounds per gallon and a OC content of 100%, by weight.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the catalysts.

c. Material Usage Limitation:
Cleanup material usage shall not exceed 1.5 tons/year (based on 456 gallons/year at 6.59 pounds VOC per gallon).

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the cleanup materials.

d. Emission Limitations:
8 pounds of VOC per hour, 40 pounds of VOC per day, and 7.6 tons of VOC per year

Applicable Compliance Method:
Compliance with the hourly, daily, and annual VOC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. and Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0372030210 Emissions Unit ID: R003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
gelcoat spray booth #1 (airless spray)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. (Also, see Section A.I.2.a. below.)
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE) per hour

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-07(G)(4), the emissions of organic materials from the cleanup of this emissions unit with photochemically reactive materials (i.e., photochemically reactive cleanup materials) shall be included with the other emissions of organic materials from this emissions unit for determining compliance with OAC rule 3745-21-07(G)(2).

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II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating (gelcoat with polyester resin and catalyst) and cleanup material employed;
 - b. the name and percent by volume of each organic chemical comprising the liquid organic material composition of each cleanup material and the classification status of each cleanup material as either a photochemically reactive material or a nonphotochemically reactive material;
 - c. the gallons of each coating employed and each photochemically reactive cleanup material employed;
 - d. the OC content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the catalyst content and the polyester resin content of each coating employed, in pounds of each per gallon;
 - f. the amount of catalyst and polyester resin for each coating employed, in pounds;
 - g. the total amount of catalysts and polyester resins for all coatings employed, in pounds;
 - h. the total OC emission rate for all coatings, in pounds OC per day;
 - i. the total OC emission rate for all photochemically reactive cleanup materials, in pounds OC per day;
 - j. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - k. the total number of hours the emissions unit was in operation; and
 - l. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (j)/(k), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section A.1.c.ii. of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly OC emission rate for the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emission rate for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emissions limitations in Section A.1.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:

8 pounds OC per hour and 40 pounds OC per day

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials. Formulation data shall be used to determine the polyester resin content and catalyst content of the coatings. For cleanup materials, the daily OC emission rate (in pounds OC/day) is calculated as the OC content (in pounds OC per gallon of cleanup material) times the daily gallons of cleanup material employed. For coatings (polyester resins with catalyst), the daily OC emissions rate Et shall be calculated by utilizing the following equations provided by the coating material supplier:

$$E_t = E_s + E_c$$

$$E_s = (C + R)10\%$$

$$E_c = (C + R)6\%$$

where

E_t = total OC emissions rate, in pounds OC/day

E_s = OC emissions rate from spraying, in pounds OC/day

E_c = OC emissions rate from curing, in pounds OC/day

C = total daily rate of catalyst(s) employed, in pounds/day

R = total daily rate of polyester resin (styrene) employed, in pounds/day

(Note: A polyester resin with catalyst is not a typical coating in which 100% of its OC content is emitted. A portion of the OC content is not emitted and is chemically bound within the coating.)

- b. Emission Limitation:
20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

- c. Emission Limitation:
0.551 pound particulate emissions (PE) per hour

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the spraying operations:

$$E = \text{maximum coating solids usage rate for the spray stations in pounds per hour} \times (1 - TE) \times (1 - CE)$$

where

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (obtained from the application equipment manufacturer or from technical references), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030210 Emissions Unit ID: R003 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
gelcoat spray booth #1 (airless spray)	OAC rule 3745-31-05 PTI # 03-6095	8 pounds of VOC per hour (excludes cleanup) 40 pounds of VOC per day (excludes cleanup) 7.6 tons of VOC per year (includes cleanup) (Also, see B.I.2.a., B.I.2.b., and B.I.2.c. below.)

2. Additional Terms and Conditions

- a. Application of white gelcoat 81.602C, at a density of 11.8 pounds per gallon and a VOC content of 31.7%, by weight, shall not exceed 13.90 gallons per hour and 69.50 gallons per day. Application of black gelcoat 81.601C, at a density of 10.8 pounds per gallon and a VOC content of 32.7%, by weight, shall not exceed 14.55 gallons per hour and 72.73 gallons per day.
- b. Cleanup material usage in this emissions unit shall not exceed 1.9 tons/year (based on 576 gallons/year at 6.59 pounds VOC per gallon).
- c. The permittee shall not employ any cleanup material that is classified as a "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC usage and annual VOC emissions for this emissions unit from cleanup:
 - a. the company identification for each cleanup material employed;
 - b. the monthly number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the monthly VOC usage for each cleanup material, in pounds; and
 - e. the total VOC usage for all cleanup materials, for the calendar year to date (end of month), in pounds or tons per year.

(Note: It is assumed that total VOC emissions for all cleanup materials is the same as total VOC usage for all cleanup materials.)
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions from this emissions unit for coatings employed and cleanup:
 - a. the total VOC emissions for all coatings employed for the calendar month, in pounds or tons (based on a summation of daily OC emissions for coatings employed that are recorded under Section A.III.1. of these terms and conditions and a presumption that all OC emissions are VOC emissions except where otherwise documented pursuant to the definition of VOC);
 - b. the total VOC emissions for all cleanup materials employed for the calendar month, in pounds or tons (based on the data recorded under Section B.III.1. of these terms and conditions);
 - c. the total VOC emissions for all coatings and cleanup materials employed for the calendar month, in pounds or tons; and
 - d. the total VOC emissions for all coatings and cleanup materials employed for the calendar year to date (end of month), in pounds or tons per year.
3. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each gelcoat;
 - b. the number of gallons employed of each gelcoat;

- c. the VOC content of each gelcoat, in percent by weight;
 - d. the density of each gelcoat, in pounds per gallon;
 - e. the number of hours the emissions unit operated;
 - f. the total rate of white gelcoat usage, in gallons per day;
 - g. the average hourly rate of white gelcoat usage, i.e., (f)/(e), in gallons per hour (average);
 - h. the total rate of black gelcoat usage, in gallons per day; and
 - i. the average hourly rate of black gelcoat usage, i.e., (h)/(e), in gallons per hour (average).

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with Section B.2.b of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each hour and each day in which the white gelcoat usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily white gelcoat usage for each exceedance;
 - b. an identification of each white gelcoat in which the density or VOC content exceeded the density or VOC content limitation specified under Section B.1.2.a. of these terms and conditions, and the actual density or VOC content for each exceedance;
 - c. an identification of each hour and each day in which the black gelcoat usage exceeded the respective hourly and daily usage limitations specified under Section B.1.2.a. of these terms and conditions, and the actual hourly or daily black gelcoat usage for each exceedance; and
 - d. an identification of each black gelcoat in which the density or VOC content exceeded the density or VOC content limitation specified under Section B.1.2.a. of these terms and conditions, and the actual density or VOC content for each exceedance.
2. The permittee shall submit annual reports which specify for this emissions unit the total usage (and VOC emissions) of cleanup materials and the total VOC emissions from coatings and cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily records showing that a cleanup material classified as a photochemically reactive material was employed (see records under Sections A.III.1.b. and A.III.1.c.). The notification shall include a copy of such records and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emission limitations and material usage limitations in Section B.I. of these terms and condition shall be determined in accordance with the following method(s):
 - a. Material Usage Limitations:

Application of white gelcoat 81.602C, at a density of 11.8 pounds per gallon and a VOC content of 31.7%, by weight, shall not exceed 13.90 gallons per hour and 69.50 gallons per day.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the resins.
 - b. Material Usage Limitations:

Application of black gelcoat 81.601C, at a density of 10.8 pounds per gallon and a VOC content of 32.7%, by weight, shall not exceed 14.55 gallons per hour and 72.73 gallons per day.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.3. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the catalysts.
 - c. Material Usage Limitation:

Cleanup material usage shall not exceed 1.9 tons/year (based on 576 gallons/year at 6.59 pounds VOC per gallon).

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the cleanup materials.

- d. Emission Limitations:
8 pounds of VOC per hour, 40 pounds of VOC per day, and 7.6 tons of VOC per year

Applicable Compliance Method:
Compliance with the hourly, daily, and annual VOC emission limitations shall be based upon the record keeping requirements contained in Section A.III.1. and Section B.III.1. of these terms and conditions and the compliance method calculations contained in Section A.V.1.a. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the VOC content and density of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030210 Emissions Unit ID: R004 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
fiberglass/resin spray booth #3 (airless spray)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. (Also, see Section A.I.2.a. below.)
	OAC rule 3745-17-07(A)	20% opacity as a 6-minute average for visible particulate emissions, except as provided by rule
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE) per hour

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-07(G)(4), the emissions of organic materials from the cleanup of this emissions unit with photochemically reactive materials (i.e., photochemically reactive cleanup materials) shall be included with the other emissions of organic materials from this emissions unit for determining compliance with OAC rule 3745-21-07(G)(2).

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II. **Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating (polyester resin and catalyst) and cleanup material employed;
 - b. the name and percent by volume of each organic chemical comprising the liquid organic material composition of each cleanup material and the classification status of each cleanup material as either a photochemically reactive material or a nonphotochemically reactive material,
 - c. the gallons of each coating employed and each photochemically reactive cleanup material employed;

- d. the OC content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the catalyst content and the polyester resin content of each coating employed, in pounds of each per gallon;
 - f. the amount of catalyst and polyester resin for each coating employed, in pounds;
 - g. the total amount of catalysts and polyester resins for all coatings employed, in pounds;
 - h. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - i. the total number of hours the emissions unit was in operation; and
 - j. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (h)/(i), in pounds per hour (average).
- [Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports, in accordance with Section A.1.c.ii. of the Part I General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
8 pounds OC per hour and 40 pounds OC per day

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping requirements contained in Section A.1.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the OC content of the cleanup materials. For cleanup materials, the daily OC emissions rate is calculated as the OC content (in pounds OC per gallon of cleanup material) times the daily gallons of cleanup material employed. For coatings (polyester resins with catalyst), the daily OC emissions rate E_t shall be calculated by utilizing the following equations provided by the coating material supplier:

$$E_t = E_s + E_c$$

$$E_s = (C + R)10\%$$

$$E_c = (C + R)6\%$$

where

E_t = total OC emissions rate, in pounds OC/day

E_s = OC emissions rate from spraying, in pounds OC/day

E_c = OC emissions rate from curing, in pounds OC/day

C = total daily rate of catalyst(s) employed, in pounds/day

R = total daily rate of polyester resin (styrene) employed, in pounds/day

(Note: A polyester resin with catalyst is not a typical coating that results in 100% of its OC content being emitted. A portion of the OC content is not emitted and is chemically bound within the coating.)

- b. Emission Limitation:
20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule

Applicable Compliance Method:
3745-17-03(B)(1)
- c. Emission Limitation:
0.551 pound particulate emissions (PE) per hour

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the spraying operations:

E = maximum coating solids usage rate for the spray stations in pounds per hour X (1-TE) X (1-CE)

where

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (obtained from the application equipment manufacturer or from technical references), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030210 Emissions Unit ID: R004 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
fiberglass/resin spray booth #3 (airless spray)	OAC rule 3745-31-05 PTI # 03-9363	8 pounds of OC per hour and 40 pounds of OC per day from coatings employed in the booth 0.20 ton of OC per year from cleanup material usage in the booth (Also, see Section B.I.2.a. below.)

2. **Additional Terms and Conditions**

- a. The permittee shall not employ any cleanup material that is classified as a "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5).

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II. **Operational Restrictions**

- 1. PTI # 03-9363 allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule

3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in PTI # 03-9363 were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and 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 the "worse case" pollutant:

Pollutant: Styrene

TLV (ug/m³): 213,000 (Note: The TLV was changed in 1997 by ACGIH to 85,000 ug/m³)

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 13.17

MAGLC (ug/m³): 5,071

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with PTI # 03-9363 or this permit. In order to avoid this noncompliance situation, prior to initiating any changes, the permittee is required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).

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 this permit; 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 any emission limitation established by PTI # 03-9363 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.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record monthly the following information for the purpose of determining annual OC emissions from this emissions unit for cleanup:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the determination of whether or not the cleanup material is classified as a photochemically reactive material;
 - e. the OC emissions for each cleanup materials, in pounds;
 - f. the total OC emissions for all cleanup materials, in pounds; and
 - g. the total OC emission rate for all cleanup materials, for the calendar year to date, in pounds or tons per year.

[Note: The term "photochemically reactive material" is defined under OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information for each change where 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.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and

- c. where 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.

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IV. Reporting Requirements

- 1. The permittee shall submit annual reports which specify for this emissions unit the total OC emissions from cleanup. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily records showing that a cleanup material classified as a photochemically reactive material was employed (see records under Sections A.III.1.b. and A.III.1.c.). The notification shall include a copy of such records and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

- 1. Compliance with the emission limitations in Section B.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.20 ton of OC per year from cleanup material usage

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the OC content of the cleanup materials.
 - b. Emission Limitations:
8 pounds of OC per hour and 40 pounds of OC per day from coatings employed

Applicable Compliance Method:
Due to the operational restriction under Section B.II.2. of these terms and conditions, the above hourly and daily OC emission limitations are essentially equivalent to the hourly and daily OC emission limitation under Section A.I.1. See the "Applicable Compliance Method" under Section A.V.1.a. for compliance with the hourly and daily limits under Section A.I.1. of these terms and conditions.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0372030210 Emissions Unit ID: R005 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
gelcoat spray booth #2 (airless spray)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. (Also, see Section A.I.2.a. below.)

OAC rule 3745-17-07(A)	20% opacity as a 6-minute average for visible particulate emissions, except as provided by rule
OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE) per hour

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-07(G)(4), the emissions of organic materials from the cleanup of this emissions unit with photochemically reactive materials (i.e., photochemically reactive cleanup materials) shall be included with the other emissions of organic materials from this emissions unit for determining compliance with OAC rule 3745-21-07(G)(2).

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for this emissions unit:
- the company identification for each coating (gelcoat with polyester resin and catalyst) and cleanup material employed;
 - the name and percent by volume of each organic chemical comprising the liquid organic material composition of each cleanup material and the classification status of each cleanup material as either a photochemically reactive material or a nonphotochemically reactive material,
 - the gallons of each coating employed and each photochemically reactive cleanup material employed;
 - the OC content of each photochemically reactive cleanup material, in pounds per gallon;
 - the catalyst content and the polyester resin content of each coating employed, in pounds of each per gallon;
 - the amount of catalyst and polyester resin for each coating employed, in pounds;
 - the total amount of catalysts and polyester resins for all coatings employed, in pounds;
 - the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - the total number of hours the emissions unit was in operation; and
 - the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (h)/(l), in pounds per hour (average).
- [Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports, in accordance with Section A.1.c.ii. of the Part I General Terms and Conditions of this permit, which include the following information:
- an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations:
8 pounds OC per hour and 40 pounds OC per day

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping requirements contained in Section A.I.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the OC content of the cleanup materials. For cleanup materials, the daily OC emissions rate is calculated as the OC content (in pounds OC per gallon of cleanup material) times the daily gallons of cleanup material employed. For coatings (polyester resins with catalyst), the daily OC emissions rate Et shall be calculated by utilizing the following equations provided by the coating material supplier:

$$Et = Es + Ec$$

$$Es = (C + R)10\%$$

$$Ec = (C + R)6\%$$

where

Et = total OC emissions rate, in pounds OC/day

Es = OC emissions rate from spraying, in pounds OC/day

Ec = OC emissions rate from curing, in pounds OC/day

C = total daily rate of catalyst(s) employed, in pounds/day

R = total daily rate of polyester resin (styrene) employed, in pounds/day

(Note: A polyester resin with catalyst is not a typical coating that results in 100% of its OC content being emitted. A portion of the OC content is not emitted and is chemically bound within the coating.)

- b. Emission Limitation:
20% opacity, as a 6-minute average for visible particulate emissions, except as provided by rule

Applicable Compliance Method:
3745-17-03(B)(1)

- c. Emission Limitation:
0.551 pound particulate emissions (PE) per hour

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the spraying operations:

$$E = \text{maximum coating solids usage rate for the spray stations in pounds per hour} \times (1-TE) \times (1-CE)$$

where

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used for the spray stations (obtained from the application equipment manufacturer or from technical references), expressed as a fraction

CE = control efficiency of the control equipment (assumed to be 98%), expressed as a fraction

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030210 Emissions Unit ID: R005 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
gelcoat spray booth #2 (airless spray)	OAC rule 3745-31-05 PTI # 03-9363	8 pounds of OC per hour and 40 pounds of OC per day from coatings employed in the booth 0.20 ton of OC per year from cleanup material usage in the booth (Also, see Section B.I.2.a. below.)

2. Additional Terms and Conditions

- a. The permittee shall not employ any cleanup material that is classified as a "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. PTI # 03-9363 allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in PTI # 03-9363 were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and 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 the "worse case" pollutant:

Pollutant: Styrene

TLV (ug/m³): 213,000 (Note: The TLV was changed in 1997 by ACGIH to 85,000 ug/m³)

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 13.17

MAGLC (ug/m³): 5,071

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with PTI # 03-9363 or this permit. In order to avoid this noncompliance situation, prior to initiating any changes, the permittee is required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).
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 this permit; 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 any emission limitation established by PTI # 03-9363 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.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record monthly the following information for the purpose of determining annual OC emissions from this emissions unit for cleanup:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the determination of whether or not the cleanup material is classified as a photochemically reactive material;
 - e. the OC emissions for each cleanup materials, in pounds;
 - f. the total OC emissions for all cleanup materials, in pounds; and
 - g. the total OC emission rate for all cleanup materials, for the calendar year to date, in pounds or tons per year.

[Note: The term "photochemically reactive material" is defined under OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information for each change where 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.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is preformed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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IV. Reporting Requirements

1. The permittee shall submit annual reports which specify for this emissions unit the total OC emissions from cleanup. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any daily records showing that a cleanup material classified as a photochemically reactive material was employed (see records under Sections A.III.1.b. and A.III.1.c.). The notification shall include a copy of such records and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emission limitations in Section B.1.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.20 ton of OC per year from cleanup material usage

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements contained in Section B.III.1. of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the OC content of the cleanup materials.
 - b. Emission Limitations:
8 pounds of OC per hour and 40 pounds of OC per day from coatings employed

Applicable Compliance Method:
Due to the operational restriction under Section B.II.2. of these terms and conditions, the above hourly and daily OC emission limitations are essentially equivalent to the hourly and daily OC emission limitation under Section A.I.1. See the "Applicable Compliance Method" under Section A.V.1.a. for compliance with the hourly and daily limits under Section A.I.1. of these terms and conditions.

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VI. Miscellaneous Requirements

1. None