OhioEPA

State of Ohio Environmental Protection Agency

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

RE: DRAFT PERMIT TO INSTALL MODIFICATION
STARK COUNTY
Application No: 15-01467

CERTIFIED MAIL

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

DATE: 3/21/2002

Alliance Equipment Company Incorporated
Patricia Antonosanti
1000 North Union Avenue
Alliance, OH 446011392

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 0** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **Canton LAA**

DRAFT MODIFICATION OF PERMIT TO INSTALL 15-01467

Application Number:	15-01467
APS Premise Number:	1576011516
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Alliance Equipment Company Incorporated
Person to Contact:	Patricia Antonosanti
Address:	1000 North Union Avenue Alliance, OH 446011392

Location of proposed air contaminant source(s) [emissions unit(s)]:
1000 North Union Avenue
Alliance, **Ohio**

Description of proposed emissions unit(s):
This PTI was issued as a Direct Final. This PTI modification will be issued as a Draft/Final.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed

sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all

applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit..

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	12
Styrene	6

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - Hand lay-up operation	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month. The OC emissions from the use of resin shall not exceed 2.36 lbs/hr. The OC emissions from the use of resin shall not exceed 1 ton/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2). See A.2.a, B.1, and B.2 below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 40 lbs/day (due to resin usage only).See A.2.b

2. Additional Terms and Conditions

2.a BAT shall be the use of low styrene, non-vapor suppressed resins (31% styrene content) and compliance with OAC rule 3745-21-07(G)(2).

2.b The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the resins employed in this emissions unit shall not exceed 31 percent styrene, by weight.

2. Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P003:

a. The company identification of each resin employed;

b. The amount, in pounds, of each resin employed;

c. The organic compound content, in percent by weight, of each resin employed; and

d. The organic compound emission rate for all resins employed, in pounds per hour, for each hour of the day.

2. The permittee shall collect and record the following information each day for emissions unit P003:

a. The company identification of each resin employed;

b. The amount, in pounds, of each resin employed;

c. The organic compound content, in percent by weight, of each resin employed;

d. The total organic compound emission rate for all resins, in pounds per day; and

e. The total combined rolling, 365-day summation of the total organic compound emission rate for all resins, in pounds per year and tons per year.

3. The permittee shall collect and record the following information each month for emissions unit P003:

a. The company identification for each cleanup material employed; and

b. The amount, in pounds, of each cleanup material employed.

4. For further information regarding records retention requirements, see General Terms and Conditions.

D. Reporting Requirements

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

a. An identification of each hour during which the organic compound emissions from the use of resins exceeded 2.36 pounds per hour and the actual organic compound emissions for each such hour for P003 only; and

b. An identification of each day during which the organic compound emissions from the use of resins exceeded 40 pounds per day and the actual organic compound emissions for each such day for P003 only.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all resins.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.2 ton OC/month from the use of cleanup material.

4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying resins (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.

5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

6. For further information regarding reporting requirements, see General Terms and Conditions.

E. Testing Requirements

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

a. Emissions Limitation
OC emissions shall not exceed 2.36 lbs/hour (due to resin usage only).

Applicable Compliance Method
Maintain hourly records of the amount of resins (in pounds) employed. Calculate the hourly emissions based on the amount (lbs/hr) of each resin employed and the use of the Unified Emission Factors (UEF) for Open Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors were

recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of resin employed. Since the styrene content of the resin is 31%, the UEF emission factor is determined from the following formula:

E.F. = 0.126 X % styrene X 2000 = 0.126 X 0.31 X 2000 = 78.12 lbs styrene/ton resin

Therefore, the hourly emission rate is calculated as follows:

78.12 lbs styrene/ton resin X lbs resin/hour X ton/2000 lbs = lbs styrene/hour

b. Emissions Limitation
OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method
Maintain daily records of the amount of resins (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each resin employed and the use of the UEF emission factor of 78.12 lbs styrene/ton resin as noted above. The daily emission rate is calculated as follows:

78.12 lbs styrene/ton resin X lbs resin/day X ton/2000 lbs = lbs styrene/day

c. Emissions Limitation
The OC emissions from the use of resin shall not exceed 1 ton/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method
Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P003. The total rolling, 365-day OC emissions shall be determined by the following procedure:

Total daily emissions = P003

where, the emission unit identification represents the lbs OC per day per unit.

rolling, 365-day emissions = Day 1 + Day 2 + ... + Day 365

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

rolling, 365-day emissions = Day 2 + Day 3 + ... + Day 365 + Day 366

rolling, 365-day emissions = Day 3 + Day 4 + ... + Day 366 + Day 367

d. Emissions Limitation
The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month.

Applicable Compliance Method
Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section B of these terms and conditions shall be determined in accordance with the following methods:

a. Operational Limitation
The maximum styrene content of the resins employed in this emissions unit shall not exceed 31 percent styrene, by weight.

Applicable Compliance Method
The OC content shall be determined using Method 24 or 24A from 40 CFR Part 60, Appendix A.

b. Operational Limitation
Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

Applicable Compliance Method
Monitoring and record keeping as required in section C.3.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, A.2, B., C., D and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 - Finish gel coat booth	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month. The OC emissions from the use of gel coat shall not exceed 5 lbs/hr. The OC emissions from the use of gel coat shall not exceed 2 tons/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2). See A.2.a, B.1, and B.2 below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 40 lbs/day (due to gel coat usage only). See A.2.b.

2. Additional Terms and Conditions

2.a BAT shall be the use of low styrene, gelcoats (29.5% styrene content), use of a controlled spray program to minimize overspray of gelcoats, and compliance with OAC rule 3745-21-07(G)(2).

2.b The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.

2. Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P004:

a. The company identification of each gel coat employed;

b. The amount, in pounds, of each gel coat employed;

c. The organic compound content, in percent by weight, of each gel coat employed; and

d. The organic compound emission rate for all gel coats employed, in pounds per hour, for each hour of the day.

2. The permittee shall collect and record the following information each day for emissions unit P004:

a. The company identification of each gel coat employed;

b. The amount, in pounds, of each gel coat employed;

c. The organic compound content, in percent by weight, of each gel coat employed;

d. The total organic compound emission rate for all gel coats, in pounds per day; and

e. The total combined rolling, 365-day summation of the total organic compound emission rate for all gel coats, in pounds per year and tons per year.

3. The permittee shall collect and record the following information each month for emissions unit P004:

a. The company identification for each cleanup material employed; and

b. The amount, in pounds, of each cleanup material employed.

4. For further information regarding records retention requirements, see General Terms and Conditions.

D. Reporting Requirements

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

a. An identification of each hour during which the organic compound emissions from the use of resins exceeded 5 pounds per hour and the actual organic compound emissions for each such hour for P004 only; and

b. An identification of each day during which the organic compound emissions from the use of gel coats exceeded 40 pounds per day and the actual organic compound emissions for each such day for P004 only.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all gel coats.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.2 ton OC/month from the use of cleanup material.

4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying resins (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.

5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

6. For further information regarding reporting requirements, see General Terms and Conditions.

E. Testing Requirements

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

a. Emissions Limitation
OC emissions shall not exceed 5 lbs/hour (due to gel coat usage only).

Applicable Compliance Method
Maintain hourly records of the amount, in pounds, of gel coats employed. Calculate the hourly emissions based on the amount (lbs/hr) of each gel coat employed and the use of the Unified Emission Factors (UEF) for Open Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors

were recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of gel coat employed. Since the styrene content of the gel coat is 29.5%, the UEF emission factor is determined from the following formula:

E.F. = 0.325 X % styrene X 2000 = 0.325 X 0.295 X 2000 = 191.75 lbs styrene/ton gel coat

Therefore, the hourly emission rate is calculated as follows:

191.75 lbs styrene/ton gel coat X lbs gel coat/hour X ton/2000 lbs = lbs styrene/hour

b. Emissions Limitation
OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method
Maintain daily records of the amount of gel coats (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each gel coat employed and the use of the UEF emission factor of 191.75 lbs styrene/ton gel coat as noted above. The daily emission rate is calculated as follows:

191.75 lbs styrene/ton gel coat X lbs resin/day X ton/2000 lbs = lbs styrene/day

c. Emissions Limitation
The OC emissions from the use of resin shall not exceed 2 tons/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method
Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P004. The total rolling, 365-day OC emissions shall be determined by the following procedure:

Total daily emissions = P004

where, the emission unit identification represents the lbs OC per day per unit.

rolling, 365-day emissions = Day 1 + Day 2 + ... + Day 365

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

rolling, 365-day emissions = Day 2 + Day 3 + ... + Day 365 + Day 366

rolling, 365-day emissions = Day 3 + Day 4 + ... + Day 366 + Day 367

d. Emissions Limitation
The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.2 ton/month.

Applicable Compliance Method
Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section B of these terms and conditions shall be determined in accordance with the following methods:

a. Operational Limitation
The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.

Applicable Compliance Method
The OC content shall be determined using Method 24 or 24A from 40 CFR Part 60, Appendix A.

b. Operational Limitation
Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

Applicable Compliance Method
Monitoring and record keeping as required in section C.3.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, A.2, B., C., D and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Set up gel coat booth	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.1 ton/month. The OC emissions from the use of gel coat shall not exceed 7.5 lbs/hr. The OC emissions from the use of gel coats shall not exceed 3 tons/yr based on a rolling, 365-day summation of emissions. The requirements of 40 lbs/day of OC emissions established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2). See A.2.a, B.1, and B.2 below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 40 lbs/day (due to gel coat usage only). See A.2.b.

2. Additional Terms and Conditions

2.a BAT shall be the use of low styrene gelcoats (29.5% styrene content), use of a controlled spray program to minimize overspray of gelcoats, and compliance with OAC rule 3745-21-07(G)(2).

2.b The 8 pounds/hour of OC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.

2. Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each hour for emissions unit P005:

a. The company identification of each gel coat employed;

b. The amount, in pounds, of each gel coat employed;

c. The organic compound content, in percent by weight, of each gel coat employed; and

d. The organic compound emission rate for all gel coats employed, in pounds per hour, for each hour of the day.

2. The permittee shall collect and record the following information each day for emissions unit P005:

a. The company identification of each gel coat employed;

b. The amount, in pounds, of each gel coat employed;

c. The organic compound content, in percent by weight, of each gel coat employed;

d. The total organic compound emission rate for all gel coats, in pounds per day; and

e. The total combined rolling, 365-day summation of the total organic compound emission rate for all resins, in pounds per year and tons per year.

3. The permittee shall collect and record the following information each month for emissions unit P005:

a. The company identification for each cleanup material employed; and

b. The amount, in pounds, of each cleanup material employed.

4. For further information regarding records retention requirements, see General Terms and Conditions.

D. Reporting Requirements

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

a. An identification of each hour during which the organic compound emissions from the use of resins exceeded 7.5 pounds per hour and the actual organic compound emissions for each such hour for P005 only; and

b. An identification of each day during which the organic compound emissions from the use of resins exceeded 40 pounds per day and the actual organic compound emissions for each such day for P005 only.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for organic compounds for all gel coats.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the emissions limit of 0.1 ton OC/month from the use of cleanup material.

4. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of noncomplying gel coats (for weight percent styrene). The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.

5. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), in writing, of any monthly record showing the use of a cleanup material other than acetone. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division, which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

6. For further information regarding reporting requirements, see General Terms and Conditions.

E. Testing Requirements

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

a. Emissions Limitation
OC emissions shall not exceed 7.5 lbs/hour (due to gel coat usage only).

Applicable Compliance Method
Maintain hourly records of the amount, in pounds, of gel coats employed. Calculate the hourly emissions based on the amount (lbs/hr) of each gel coat employed and the use of the Unified Emission Factors (UEF) for Open Molding of Composites developed by the Composite Fabricators Association (CFA) dated April 7, 1999. The UEF emission factors were recommended for use by USEPA while AP-42 Chapter 4 is being revised. The UEF emission factors are based on pounds of styrene per ton of gel coat employed. Since the styrene content of the gel coat is 29.5%, the UEF emission factor is determined from the following formula:

E.F. = 0.325 X % styrene X 2000 = 0.325 X 0.295 X 2000 = 191.75 lbs styrene/ton gel coat

Therefore, the hourly emission rate is calculated as follows:

191.75 lbs styrene/ton gel coat X lbs gel coat/hour X ton/2000 lbs = lbs styrene/hour

b. Emissions Limitation
OC emissions shall not exceed 40 lbs/day (due to resin usage only).

Applicable Compliance Method
Maintain daily records of the amount of gel coats (in pounds) employed. Calculate the daily emissions based on the amount (lbs/hr) of each gel coat employed and the use of the UEF emission factor of 191.75 lbs styrene/ton gel coat as noted above. The daily emission rate is calculated as follows:

191.75 lbs styrene/ton gel coat X lbs resin/day X ton/2000 lbs = lbs styrene/day

c. Emissions Limitation
The OC emissions from the use of resin shall not exceed 3 tons/yr based on a rolling, 365-day summation of emissions.

Applicable Compliance Method
Maintain daily records of the combined total rolling, 365-day summation of OC emissions generated by P005. The total rolling, 365-day OC emissions shall be determined by the following procedure:

Total daily emissions = P005

where, the emission unit identification represents the lbs OC per day per unit.

rolling, 365-day emissions = Day 1 + Day 2 + ... + Day 365

where each day represents the total daily OC emissions as calculated above.

After 365 days have elapsed, it is then necessary to begin adding the next day and dropping the first day of the previous year as follows:

rolling, 365-day emissions = Day 2 + Day 3 + ... + Day 365 + Day 366

rolling, 365-day emissions = Day 3 + Day 4 + ... + Day 366 + Day 367

d. Emissions Limitation
The organic compound (OC) emissions from the use of cleanup material shall not exceed 0.1 ton/month.

Applicable Compliance Method

Monitoring and record keeping as required in section C.3.

2. Compliance with the operational limitations in section B of these terms and conditions shall be determined in accordance with the following methods:

a. Operational Limitation
The maximum styrene content of the gel coats employed in this emissions unit shall not exceed 29.5 percent styrene, by weight.

Applicable Compliance Method
The OC content shall be determined using Method 24 or 24A from 40 CFR Part 60, Appendix A.

b. Operational Limitation
Only non-photochemically reactive material shall be used for cleanup operations. The permittee identified acetone as the current material used for cleanup operations. Usage of any other cleanup materials by the permittee shall require written notification to the Canton City Health Department, Air Pollution Control Division which provides the necessary information to demonstrate that the cleanup material is non-photochemically reactive.

Applicable Compliance Method
Monitoring and record keeping as required in section C.3.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, A.2, B., C., D and E.