



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

10/14/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-72-03-0210
Poly Foam International Inc. Style Crest Products
Bryan T Kern
P.O. Box 690
600 Hagerty Drive
Fremont, OH 43420

Dear Bryan T Kern:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

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

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Michigan



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 10/14/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Poly Foam International Inc. Style Crest Products
P.O. Box 690
600 Hagerty Drive
Fremont, OH 43420

of a Title V permit for Facility ID: 03-72-03-0210

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

K001 (Paint dip line)
Conveyor and paint dip tank

R001 (Resin Spray Unit #1)
Fiberglass spray booth

R002 (Resin Spray Unit #2)
Fiberglass spray booth

R003 (Gel Coat Spray Unit #1)
Gel coat spray booth

R004 (Resin Spray Unit #3)
Fiberglass spray booth

R005 (Gel Coat Spray Unit #2)
Gel coat spray booth

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining

to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
 - d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio

EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any

defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. 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).

4. 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.

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint dip line (K001)
Activity Description: Conveyor and paint dip tank

A. State and Federally Enforceable Section

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

None

II. Operational Restrictions

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

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.

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.

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

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.

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.

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):

- 1.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.

- 1.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.

Facility Name: **Poly Foam International Inc. Style Crest Products**

Facility ID: **03-72-03-0210**

Emissions Unit: **Paint dip line (K001)**

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Spray Unit #1 (R001)
Activity Description: Fiberglass spray booth

A. State and Federally Enforceable Section

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

- 2.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).

II. Operational Restrictions

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

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

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.

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):

V. Testing Requirements (continued)

- 1.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 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 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.)

- 1.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)

V. Testing Requirements (continued)

- 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).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

- 2.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.
- 2.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).
- 2.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).

II. Operational Restrictions

None

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.)

III. Monitoring and/or Record Keeping Requirements (continued)

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.

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.I.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.I.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.I.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.I.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.

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):
 - 1.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.
 - 1.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.
 - 1.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.
 - 1.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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Spray Unit #2 (R002)
Activity Description: Fiberglass spray booth

A. State and Federally Enforceable Section

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

- 2.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).

II. Operational Restrictions

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

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

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.

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):

V. Testing Requirements (continued)

- 1.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 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 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.)

- 1.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)

V. Testing Requirements (continued)

- 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).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

- 2.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.
- 2.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).
- 2.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).

II. Operational Restrictions

None

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.)

III. Monitoring and/or Record Keeping Requirements (continued)

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.

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.I.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.I.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.I.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.I.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.

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):
 - 1.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.
 - 1.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.
 - 1.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.
 - 1.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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gel Coat Spray Unit #1 (R003)
Activity Description: Gel coat spray booth

A. State and Federally Enforceable Section

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

- 2.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).

II. Operational Restrictions

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

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

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.

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):

V. Testing Requirements (continued)

- 1.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 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 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.)

- 1.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)

V. Testing Requirements (continued)

- 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).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

- 2.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.
- 2.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).
- 2.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).

II. Operational Restrictions

None

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.)

III. Monitoring and/or Record Keeping Requirements (continued)

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).

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.

IV. Reporting Requirements (continued)

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.

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):
 - 1.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.
 - 1.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.
 - 1.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.
 - 1.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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Spray Unit #3 (R004)
Activity Description: Fiberglass spray booth

A. State and Federally Enforceable Section

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

- 2.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).

II. Operational Restrictions

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

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

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.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.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 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.)

- 1.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)

- 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).

Facility Name: **Poly Foam International Inc. Style Crest Products**

Facility ID: **03-72-03-0210**

Emissions Unit: **Resin Spray Unit #3 (R004)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.1.2.a. below.)

2. Additional Terms and Conditions

- 2.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).

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

II. Operational Restrictions (continued)

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.

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).]

III. Monitoring and/or Record Keeping Requirements (continued)

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.

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.

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):
 - 1.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.
 - 1.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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gel Coat Spray Unit #2 (R005)
Activity Description: Gel coat spray booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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

- 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).

II. Operational Restrictions

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

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 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

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;
 - 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.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.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 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.)

- 1.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)

- 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).

Facility Name: **Poly Foam International Inc. Style Crest Products**

Facility ID: **03-72-03-0210**

Emissions Unit: **Gel Coat Spray Unit #2 (R005)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.1.2.a. below.)

2. Additional Terms and Conditions

- 2.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).

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

II. Operational Restrictions (continued)

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.

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).]

III. Monitoring and/or Record Keeping Requirements (continued)

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.

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.

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):
 - 1.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.
 - 1.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.

VI. Miscellaneous Requirements

None

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