



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

6/3/2015

Certified Mail

Mr. Bob Glasgow
 A.R.E. Accessories, LLC - Mount Eaton Fa
 17494 Dover Road
 Mt.Eaton, OH 44659

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000291
 Permit Number: P0118895
 Permit Type: Initial Installation
 County: Wayne

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Michael E. Hopkins, P.E.
 Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
 Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

A.R.E. is a fiberglass truck cap manufacturer.

3. Facility Emissions and Attainment Status:

The facility is located in the city of Mount Eaton in Wayne County. This county is currently considered to be in attainment for all criteria pollutants. The facility currently emits PE, VOCs, and HAPs. The facility wide potential to emit has been limited below Title V thresholds by federally enforceable limitations.

4. Source Emissions:

This is an initial installation permit for two gelcoat and primer booths (R018 and R019), one hand lay-up area (R020), and one resin spray-up booth (R021). Emissions units P004, R015, R004-R007, R012-R014, and R016 are being included in P0118895 for consistency. No changes have been made to these emissions units.

The facility requested a federally enforceable limit of 58.40 tons of VOCs, 9.5 tons of a single HAP and 24.5 tons total HAPs per rolling, 12-month period, for these emissions unit. To achieve this goal, the permittee will be required to keep monthly records for the facility-wide rolling 12 month emissions of single HAP and total HAPs, and submit deviation reports.

The Volatile Organic Compound (VOC) emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Emissions of Hazardous Air Pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R021, all De Minimis units, and units exempt from the requirement to obtain a permit-to-install, shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

Facility is subject to OAC rule 3745-21-25 Table 2: VOC emissions limits for specific open molding with VOC emissions less than the threshold of one hundred tons of VOC per year. This table has various VOC emission limitations, in pounds per ton applied. These emissions limits are based on type of operation and application method. Please see permit term 5.b)(2)e. for specific emission limits.

5. Conclusion:

The emissions limitations, operational restrictions, and recordkeeping are sufficiently federally enforceable to maintain the facility a minor source for VOCs, single HAP, and total HAPs, thus avoiding Title V.

6. Please provide additional notes or comments as necessary:

The new emission units, R018, R019, R020, and R021, will replace emissions units R008, R009, R010, and R011. Emission units R008-R011 will be shut-down before the operation of the new units, R018-R021. This project will not increase the facility's potential emissions because the new emission units will retain the same emission limits as the units being shut-down.



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (R004-R007, R012-R016, and R018-R021)	58.40
Single HAP (facility-wide)	9.50
Combined HAP (facility-wide)	24.50
PE (P004)	12.84
NOx (R004-R007 natural gas)	18.34
CO (R004-R007 natural gas)	52.67

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation

A.R.E. Accessories, LLC - Mount Eaton Fa

17494 Dover Road,, Mount Eaton, OH 44659

ID#:P0118895

Date of Action: 6/3/2015

Permit Desc: This is an initial installation permit for two gelcoat and primer booths (R018 and R019), one hand lay-up area (R020), and one resin spray-up booth (R021). Emissions units P004, R015, R004-R007, and R012-R016 are being included in P0118895 for consistency. No changes have been to these emissions units..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Ynes Arocho, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
A.R.E. Accessories, LLC - Mount Eaton Fa**

Facility ID:	0285000291
Permit Number:	P0118895
Permit Type:	Initial Installation
Issued:	6/3/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
A.R.E. Accessories, LLC - Mount Eaton Fa

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Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa
Permit Number: P0118895
Facility ID: 0285000291
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285000291
Application Number(s): A0053421, M0003393
Permit Number: P0118895
Permit Description: This is an initial installation permit for two gelcoat and primer booths (R018 and R019), one hand lay-up area (R020), and one resin spray-up booth (R021). Emissions units P004, R015, R004-R007, and R012-R016 are being included in P0118895 for consistency. No changes have been to these emissions units.
Permit Type: Initial Installation
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/3/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

A.R.E. Accessories, LLC - Mount Eaton Fa
17494 Dover Road
Mount Eaton, OH 44659

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118895

Permit Description: This is an initial installation permit for two gelcoat and primer booths (R018 and R019), one hand lay-up area (R020), and one resin spray-up booth (R021). Emissions units P004, R015, R004-R007, and R012-R016 are being included in P0118895 for consistency. No changes have been to these emissions units.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P004
Company Equipment ID:	Sanding and Grinding Booth
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	R015
Company Equipment ID:	Primer Spray Booth
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable

Group Name: Gelcoat Booths

Emissions Unit ID:	R018
Company Equipment ID:	Gelcoat and Primer Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R019
Company Equipment ID:	Gelcoat and Primer Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R020
Company Equipment ID:	Hand Lay-Up Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R021
Company Equipment ID:	Spray-up Booth #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	R004
Company Equipment ID:	Paint Booth 1
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Paint Booth 2
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Paint Booth 3
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
 A.R.E. Accessories, LLC - Mount Eaton Fa
Permit Number: P0118895
Facility ID: 0285000291

Effective Date: To be entered upon final issuance

Emissions Unit ID:	R007
Company Equipment ID:	Paint Booth 4
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable

Group Name: Resin Booths

Emissions Unit ID:	R012
Company Equipment ID:	Gelcoat Station
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R013
Company Equipment ID:	Polyester Resin Spray-Up Booth
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R014
Company Equipment ID:	Polyester Resin Spray-Up Booth
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R016
Company Equipment ID:	Large Component Spray-Up Area
Superseded Permit Number:	P0107136
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa
Permit Number: P0118895
Facility ID: 0285000291
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa
Permit Number: P0118895
Facility ID: 0285000291
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa
Permit Number: P0118895
Facility ID: 0285000291
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P004, Sanding and Grinding Booth

Operations, Property and/or Equipment Description:

sanding and grinding booth w/ 4 bag filters

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions with a diameter less than or equal to 10 microns (PM ₁₀) shall not exceed 0.03 gr/dscf (2.93 lbs/hr) and 12.84 tons per year. There shall be no visible particulate emissions from the control system exhaust.
b.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The dust collectors shall be operated with sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The pressure drop across each dust collector shall be maintained within the range of 1.5 to 4 inches of water column at all times while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to monitor pressure drop across each dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each dust collector on a weekly basis.
- (2) The permittee shall perform weekly checks for any visible particulate emissions from the exhausts of the dust collectors. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhausts from the dust collectors for this emissions unit are currently vented back into the building. This is the normal operating mode for this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any dust collector did not comply with the allowable range specified above.
- (2) The permittee shall submit quarterly written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective action(s) taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous three-month period.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a

reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM₁₀ emissions shall not exceed 0.03 gr/dscf (2.93 lbs/hr).

Applicable Compliance Method:

If required, compliance with the grain loading limit shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

PM₁₀ emissions shall not exceed 12.84 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable PM₁₀ emission limitation (2.93 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

There shall be no visible particulate emissions from the control system exhaust.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

g) Miscellaneous Requirements

(1) None.



2. R015, Primer Spray Booth

Operations, Property and/or Equipment Description:

primer spray booth

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	On days when coating non-metal parts or days when coating metal and non-metal parts, organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day. Compliance with the requirements of OAC rule 3745-31-05(A)(3) shall include compliance with OAC rule 3745-21-09(U) and the requirements established pursuant to OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) provided that it employs no more than 10 gallons per day of coatings used to coat metal parts.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)	See b(2)a and b)(2)b.
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

- a. The organic compound/volatile organic compound (OC/VOC) emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- b. Emissions of hazardous air pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R021, and all de minimis units* and units exempt from the requirement to obtain a permit-to-install** shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

* as defined in OAC rule 3745-15-05

** pursuant to OAC rule 3745-31-03

A listing of HAPs can be found in Section 112(b) of the Clean Air Act.

c) Operational Restrictions

- (1) The permittee shall employ no more than 10 gallons per day of coatings applied to metal parts in this emissions unit.
- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) if available; or with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual if available; or with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to optimum operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e., $b \times c$), in pounds;

Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation.

- e. the total number of hours that the emissions unit was in operation; and
- f. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., d / e).

(2) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004-R007, R012-R016, and R018-R021, combined, in tons.

(3) The permittee shall collect and record the following information each month for this emissions unit:

- a. the company name and identification number of each coating and cleanup material employed;
- b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
- c. the number of gallons of each coating and cleanup material employed;

Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed.

- d. the total emissions of each individual HAP, in pounds [i.e., summation of $(b \times c)$ for each individual HAP for all the coatings and cleanup materials];
- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from d)(3)d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
- f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e, summation of "d" for all the HAPs); and
- g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from d)(3)f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

(4) The permittee shall collect and record the following information each day that metal parts are coated in this emissions unit:

- a. the name and identification number of each coating applied to metal parts;
 - b. the VOC content of each coating applied to metal parts, as applied, in pounds per gallon;
 - c. the volume, in gallons, of each coating applied to metal parts; and
 - d. the total volume, in gallons, of all of the coatings applied to metal parts.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals if available for the dry particulate filter, or documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, if available, with any modifications deemed necessary by the permittee or operator. If a manufacturer's inspection frequency is available, inspections shall be performed at such intervals, and the permittee shall maintain a copy of the recommendations to be made available to the Ohio EPA, upon request. If manufacturer's recommendations are not available, the filter shall be inspected weekly, and replaced as needed.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations, if available, with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all exceedances of the weighted average VOC hourly, daily and annual emission limitations specified in b)(1) and b)(2).
- (2) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations, if available, with any documented modifications made by the permittee when the emissions unit(s) was/were in operation.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

On days when coating non-metal parts or days when coating metal and non-metal parts, OC emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

The OC/VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitations:

Emissions of HAPs from emissions units R004-R007, R012-R016, and R018-R021, and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year as a rolling, 12-month



summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

Applicable Compliance Method:

Compliance with these annual emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(3).

d. Emission Limitation:

The permittee shall employ no more than 10 gallons per day of coatings applied to metal parts in this emissions unit.

Applicable Compliance Method:

Compliance with this operational restriction shall be demonstrated based upon the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Paint Booths: R004, R005, R006, and R007.

EU ID	Operations, Property and/or Equipment Description
R004	paint spray booth #1 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R005	paint spray booth #2 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R006	paint spray booth #3 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R007	paint spray booth #4 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. None.
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a through b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)e, b)(2)f and b)(2)h.
c.	OAC rule 3745-21-09(U)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-07(M)	a) The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)	b) See c)(3) and c)(4).

(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100 percent, by weight, and a minimum destruction efficiency of 95 percent, by weight.
- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- c. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation {i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE when opened}. Therefore, the permittee will not be required to perform any additional monitoring, recordkeeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- d. The OC/VOC emissions from emissions units R004 - R007, R012, R013, R014, and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- e. The OC/VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- f. Emissions from natural gas combustion from the ovens associated with emissions units R004 - R007 and from the RTO, combined, shall not exceed the following:
 - particulate matter less than 10 microns in diameter (PM₁₀) 0.13 ton per year;
 - nitrogen oxides (NO_x) 18.34 tons per year;



carbon monoxide (CO)	52.67 tons per year;
sulfur dioxide (SO ₂)	0.01 ton per year; and
OC/VOC	0.09 ton per year.

- g. The emission limitations specified in b)(2)f represent the potential to emit for these units. Therefore, no monitoring or record keeping requirements are required to demonstrate compliance with these limits.
- h. Emissions of hazardous air pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R021, and all de minimis units* and units exempt from the requirement to obtain a permit-to-install** shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

* as defined in OAC rule 3745-15-05

** pursuant to OAC rule 3745-31-03

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Northeast District Office of Ohio EPA.

c) Operational Restrictions

- (1) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.
- (2) This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the RTO. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
 - b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section c)(2)b. and are not included in the calculations in section c)(2)c. shall be closed during routine operation of the process; and

- e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
 - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
- (4) The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units R004 - R007, R012, R013, R014 and R016, combined.
- (5) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004-R007, R012-R016, and R018-R021, combined, in tons.
- (6) The permittee shall collect and record the following information each month for emissions units R004 - R007, combined:
- a. the company name and identification number of each coating and cleanup material employed;
 - b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total controlled emissions of each individual HAP, in pounds, for all coatings and cleanup materials employed [i.e., summation of (b x c) for each individual HAP for all the coatings and cleanup materials employed x (1-overall control efficiency)];
- Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation. The overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance shall be used in this calculation.
- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d)(6)d. for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
 - f. the total HAP emissions, in tons, for all the coatings and cleanup materials employed (i.e, summation of d. for all the HAPs); and
 - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from d)(6)f.) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals if available for the dry particulate filter, or documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, if available; with any modifications deemed necessary by the permittee or operator. If a manufacturer's inspection frequency is available, inspections shall be performed at such intervals, and the permittee shall maintain a copy of the recommendations to be made available to the Ohio EPA, upon request. If manufacturer's recommendations are not available, the filter shall be inspected weekly, and replaced as needed.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair.
- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations, if available, with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in c)(1).

The permittee shall also submit deviation (excursion) reports that identify all periods of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

- (2) The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly emission limitation specified in b)(2)d and the annual emission limitations specified in b)(2)e and b)(2)h.
 - (3) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations, if available, with any documented modifications made by the permittee when the emissions unit(s) was/were in operation.
 - (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
 - (5) The permittee shall include, in the PER, a description of any changes made to the Permanent Total Enclosure (PTE).
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in f(2) and OAC rule 3745-21-10(C).
 - b. Emission Limitation:

The OC/VOC emissions from emissions units R004 - R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(4).

The tpy emission limitation was developed by multiplying the short-term allowable OC/VOC emission limitation (5.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if



compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

The OC/VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(5).

d. Emission Limitation:

Emissions of HAPs from emissions units R004-R007, R012-R016, R018-R021, and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(6).

e. Emission Limitation:

Emissions from natural gas combustion from the ovens associated with emissions units R004 - R007 and from the RTO, combined, shall not exceed the following:

- PM₁₀ 0.13 ton per year;
- NO_x 18.34 tons per year;
- CO 52.67 tons per year;
- SO₂ 0.01 ton per year; and
- OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be demonstrated using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with R004 - R007 and emission factors provided by the manufacturer for the RTO.

- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted to demonstrate compliance with the established emission limitations requirements specified approximately 2.5 years after permit issuance and within 6 months prior to the permit expiration.
 - b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.



Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa

Permit Number: P0118895

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

- (3) The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements
 - (1) None.



4. Emissions Unit Group -Resin Booths: R012, R013, R014, and R016.

EU ID	Operations, Property and/or Equipment Description
R012	gelcoat station and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R013	polyester resin/fiberglass spray-up booth #1 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R014	polyester resin/fiberglass spray-up booth #2 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R016	large component spray-up area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a through b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)e and b)(2)f.
c.	OAC rule 3745-21-25(G)(3)	Tables 1 and 2. See b)(2)g and c)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-07(M)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.
- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- c. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation {i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE when opened}. Therefore, the permittee will not be required to perform any additional monitoring, recordkeeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- d. The OC/VOC emissions from emissions units R004 - R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- e. The OC/VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- f. Emissions of hazardous air pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R021, and all de minimis units* and units exempt from the requirement to obtain a permit-to-install** shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

* as defined in OAC rule 3745-15-05

** pursuant to OAC rule 3745-31-03

A listing of HAPs may be found in Section 112(b) of the Clean Air Act.

- g. The emission limitations and control requirements from OAC rule 3745-21-25, and the associated operational restrictions, monitoring, record keeping and reporting requirements shall become federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-25, as a revision to Ohio's State Implementation Plan (SIP). The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)d.

c) Operational Restrictions

- (1) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.
- (2) This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
 - b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section c)(2)b. and are not included in the calculations in section c)(2)c. shall be closed during routine operation of the process; and
 - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.
- (3) The permittee shall implement the appropriate work practice standards from Table 1 and the VOC emission limits from Table 2 of OAC rule 3745-21-25.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.

- (2) The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
- (3) The permittee shall collect and record the following information each day for this emissions unit:
- a. the company identification and number of pounds of each gelcoat and resin employed;
 - b. the OC/VOC content of each gelcoat and resin, in percent by weight;
 - c. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW and multiplying by (1 - control efficiency);
 - d. the company identification for each coating and cleanup material employed;
 - e. the number of gallons of each coating and cleanup material employed;

Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation.
 - f. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
 - g. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined [i.e., (e x f) x (1 - control efficiency)], in pounds;

Note: These calculations shall be performed using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
 - h. the total number of hours that the emissions unit was in operation;
 - i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., c + g); and
 - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i / h).
- (4) The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units R004 - R007, R012, R013, R014 and R016, combined.

- (5) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004-R007, R012-R016, and R018-R021, combined, in tons.
- (6) The permittee shall collect and record the following information each month for this emissions unit:
- a. the company name and identification number of each coating, cleanup material, gelcoat and resin employed;
 - b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon and for each resin employed, in weight percent;
 - c. the number of gallons of each coating and cleanup material, and number of pounds of each gelcoat, and resin employed;
- Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed.
- d. the total emissions of each individual HAP, in pounds [i.e., summation of (b x c) x (1 - control efficiency) for each individual HAP for all the coatings, cleanup materials, gelcoats, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the gelcoats and resins];
- Note: These calculations shall be performed using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from d)(6)d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
 - f. the total HAP emissions, in tons, for all the coatings, cleanup materials, gelcoats, and resins employed (i.e, summation of d. for all the HAPs); and
 - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from d)(6)f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].
- (7) The permittee shall collect and record the following information each month for this emissions unit:
- a. calculated weighted average VOC emissions limit for the last 12 months (using the equation presented in OAC rule 3745-21-25(G)(3)(a);
 - b. calculate the weighted average VOC emission factor (using the equation presented in OAC rule 3745-21-25 G)(3)(b); and

- c. if each rolling, 12-month average VOC emission factor in “a” and “b” above is less than or equal to the corresponding rolling, 12-month average VOC emission limit specified in Table 2 of OAC rule 3745-21-25, then the operation is compliant.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in c)(1).

The permittee shall also submit deviation (excursion) reports that identify all periods of downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

- (2) The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly and annual emission limitations specified in b)(2).
- (3) The permittee shall submit deviation (excursion) reports that identify all exceedances of the weighted average VOC, hourly, and annual emission limitations specified in sections b)(1) and b)(2).
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (5) The permittee shall include, in the PER, a description of any changes made to the Permanent Total Enclosure (PTE).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.

Applicable Compliance Method:

Compliance shall be demonstrated by stack testing in accordance with f(2) and OAC rule 3745-21-10(C).



b. Emission Limitation:

The OC/VOC emissions from emissions units R004 - R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by the record keeping requirements specified in d)(4).

The tpy emission limitation was developed by multiplying the short-term allowable OC/VOC emission limitation (5.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

The OC/VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(5).

d. Emission Limitation:

Emissions of HAPs from emissions units R004-R007, R012-R016, R018-R021, and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(6).

e. Emission Limitation:

The permittee shall comply with all applicable VOC emission limits from Table 2 of OAC rule 3745-21-25.

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated by the record keeping requirements specified in d)(7).

- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted to demonstrate compliance with the established emission limitations requirements specified approximately 2.5 years after permit issuance and within 6 months prior to the permit expiration.
 - b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.



Draft Permit-to-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa

Permit Number: P0118895

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

- (3) The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements
 - (1) None.



5. Emissions Unit Group -Gelcoat Booths: R018, R019, R020, and R021.

EU ID	Operations, Property and/or Equipment Description
R018	Gelcoat and primer booth 1.
R019	Gelcoat and primer booth 2.
R020	Hand lay-up area.
R021	Spray-up booth 3.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(5) - d)(8) and e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The emission limitation specified by this rule is equivalent to the emission limitation established in Table 2 of OAC rule 3745-21-25. See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the enforceable restriction in b)(1)c. See b)(2)b.
c.	OAC rule 3745-31-05(D) June 30, 2008	See b)(2)c and b)(2)d.
d.	OAC rule 3745-21-25	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed the limitations specified in Table 2 of the rule for open molding operations. See b)(2)e.
e.	OAC rule 3745-114-01	See d)(5) – d)(8) and e)(4).

(2) Additional Terms and Conditions

- a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. Emissions of hazardous air pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R021, all de minimis units, and units exempt from the requirement to obtain a permit-to-install, shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.
- d. The VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.



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- e. The VOC threshold for this facility calculated according to OAC rule 3745-21-25(F) is less than 100 tons per year. The VOC emissions from resin application in each emissions unit shall not exceed the following:

Type of operation	Resin application method	VOC emissions limit
Open molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 pounds/ton applied
	Filament application	171 pounds/ton applied
	Manual resin application	123 pounds/ton applied
Open molding: non-CR/HS	Mechanical resin application	88 pounds/ton applied
	Filament application	188 pounds/ton applied
	Manual resin application	87 pounds/ton applied
Open molding: tooling	Mechanical resin application	254 pounds/ton applied
	Manual resin application	157 pounds/ton applied
Open molding: low-flame spread/low-smoke products	Mechanical resin application	497 pounds/ton applied
	Filament application	270 pounds/ton applied
	Manual resin application	238 pounds/ton applied
Open molding: shrinkage controlled resins	Mechanical resin application	354 pounds/ton applied
	Filament application	215 pounds/ton applied
	Manual resin application	180 pounds/ton applied
Open molding: gel coat	Tooling gel coat	440 pounds/ton applied
	White/off white pigmented gel coat	267 pounds/ton applied
	All other pigmented gel coat	377 pounds/ton applied
	CR/HS or high performance gel coat	605 pounds/ton applied
	Fire retardant gel coat	854 pounds/ton applied
	Clear production gel coat	522 pounds/ton applied

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the company identification of each gelcoat and resin employed;
 - b. the number of pounds of each gelcoat and resin employed;
 - c. the VOC content of each gelcoat and resin, in percent by weight;
 - d. the amount of VOC emitted for each gelcoat and resin, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW;

- e. the amount of VOC emitted for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW;
- f. the company identification of each coating and cleanup material employed;
- g. the number of gallons of each coating and cleanup material employed;
- h. the VOC content of each coating and cleanup material, in pounds per gallon;
- i. the amount of VOC emitted for each coating and cleanup material, in pounds; and
- j. the amount of VOC emitted for all coatings and cleanup materials combined, in pounds.

The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation in d)(1)g.

- (2) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly VOC emissions for R004-R007, R012-R016, and R018-R021, combined, in tons.
- (3) The permittee shall maintain monthly records of the following information:
 - a. the company name and identification number of each coating, cleanup material, gelcoat, and resin employed;
 - b. the individual HAP content of each coating and cleanup material employed, in pounds/gallon and for each gelcoat and resin employed, in weight percent;
 - c. the number of gallons of each coating and cleanup material and the number of pounds of each gelcoat and resin employed;
 - d. the total emissions of each HAP, in pounds, for each individual HAP for all the coatings, cleanup materials, gelcoats, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the gelcoats and resins;
 - e. the rolling, 12-month summation of the monthly emission of each individual HAP, in tons;
 - f. the total HAP emissions, in pounds, for all the coatings, cleanup materials, gelcoats, and resins employed; and
 - g. the rolling, 12-month summation of the total monthly HAP emission, in tons.

The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation in d)(3)c.



(4) The permittee shall use the following method, as specified in OAC rule 3745-21-25-(G)(3), to demonstrate compliance with the VOC emissions limitations of Table 2 of OAC rule 3745-25-25:

a. Demonstrate each month that each weighted average of the VOC emissions limits in table 2 of OAC rule 3745-21-25 that apply are being met. When using this option, the permittee shall demonstrate compliance with the weighted average VOC emissions limit for all open molding operations.

i. Each month calculate the weighted average VOC emissions limit for all open molding operations for the facility for the last twelve-month period to determine the VOC emissions limit the owner or operator shall meet.

To do this, multiply the individual VOC emissions limits in table 2 of OAC rule 3745-21-25 for each open molding operation type by the amount of neat resin plus used in the last twelve months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus used in open molding over the last twelve months as shown in the following equation:

$$\text{Weighted Average VOC Emission Limitation} = \frac{\sum_{i=1}^n (EL_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

where:

EL_i = VOC emissions limit for operation type i , pounds per ton from table 2 of OAC rule 3745-21-25;

Material_i = amount of neat resin plus used during the last twelve-month period for operation type i , tons; and

n = number of operations.

ii. Each month calculate the weighted average VOC emissions factor for open molding.

To do this, multiply the actual open molding operation VOC emissions factors calculated in paragraph d)(4)a.ii. of this rule and the amount of neat resin plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus used in open molding operations as shown in the following equation:

$$\text{Actual Weighted Average} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

VOC Emissions Factor

where:

Actual Operation EF_i = actual VOC emissions factor for operation type i, pounds of VOC per ton of neat resin plus;

Material $_i$ = amount of neat resin plus used during the last twelve calendar months for operation type i, tons; and

n = number of operations.

- iii. Compare the values calculated in d)(4)a.i and d)(4)a.ii. If each twelve-month rolling average VOC emissions factor is less than or equal to the corresponding twelve-month rolling average VOC emissions limit, then the operation is in compliance.
- (5) The FEPTIO application for this/these emissions unit(s), R018-R021, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Styrene

TLV (mg/m³): 85,202.45

Maximum Hourly Emission Rate (lbs/hr): 8.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 546.92

MAGLC (ug/m³): 2,028.63

The permittee, has demonstrated that emissions of Styrene, from emissions unit(s) R018-R021, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the

document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAP emissions shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP;
 - ii. HAPs emissions shall not exceed 24.5 tons per year as a rolling, 12-month summation for total combined HAPs;
 - iii. VOC emissions shall not exceed 58.40 tons per year as a rolling, 12-month summation; and
 - iv. VOC emissions shall not exceed the limitations specified in Table 2 of OAC rule 3745-21-25 for open molding operations.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Ohio EPA Northeast District Office.

- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- The VOC emissions from emissions units R004-R007, R012-R016, and R018-R021, combined, shall not exceed 58.40 tons/yr, as a rolling, 12-month summation.
- Applicable Compliance Method:
- Compliance with this annual emissions limitation shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2).
- b. Emission Limitation:
- Emissions of HAPs from emissions units R004-R007, R012-R016, R018-R021, all de minimis units, and units exempt from the requirement to obtain a permit-to-install, shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.
- Applicable Compliance Method:
- Compliance with these annual emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(3).
- c. Emission Limitation:
- The VOC emissions from resin application in each emissions unit shall not exceed the VOC emission limitations for open molding operations specified in Table 2 of OAC rule 3745-21-25.
- Applicable Compliance Method:
- Compliance with the applicable emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(4).
- g) Miscellaneous Requirements
- (1) None.