Ohio Environmental Protection Agency

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

7/10/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Bob Glasgow
A.R.E. Accessories, LLC
400 Nave Road SE
P.O. Box 1100
Massillon, OH 44648

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576131793
Permit Number: P0118894
Permit Type: Initial Installation
County: Stark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: U.S. EPA
Canton; Pennsylvania; West Virginia

FINAL

Division of Air Pollution Control
Permit-to-Install
for
A.R.E. Accessories, LLC

Facility ID:	1576131793
Permit Number:	P0118894
Permit Type:	Initial Installation
Issued:	7/10/2015
Effective:	7/10/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
A.R.E. Accessories, LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 8
9. Reporting Requirements 8
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 10
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 14
1. P021, Mold Maintenance Repair Room 15

Authorization

Facility ID:	1576131793
Facility Description:	Manufacture of fiberglass truck caps and other products
Application Number(s):	A0053021
Permit Number:	P0118894
Permit Description:	PTI for an existing mold maintenance and repair process that had been de minimis based on recordkeeping of actual emissions, but now needs to increase above 10 lb/day of VOC due to changes in the production process. Processed as an initial installation PTI because the requested changes do not meet the definition of a modification.Uncontrolled VOC emissions from the use of mold repair, cleaning and release materials.
Permit Type:	Initial Installation
Permit Fee:	$200.00
Issue Date:	7/10/2015
Effective Date:	7/10/2015

This document constitutes issuance to:

A.R.E. Accessories, LLC
400 Nave Road SE
Massillon, OH 44646

of a Permit-to-Install 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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118894
Permit Description: PTI for an existing mold maintenance and repair process that had been de minimis based on recordkeeping of actual emissions, but now needs to increase above 10 lb/day of VOC due to changes in the production process. Processed as an initial installation PTI because the requested changes do not meet the definition of a modification.Uncontrolled VOC emissions from the use of mold repair, cleaning and release materials.

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

Emissions Unit ID:	**P021**
Company Equipment ID:	Mold Maintenance Repair Room
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theCanton City Health Departmentin accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) 2. below (Definitions)

2. Definitions as used in this permit:

   Cleaning:means removal of composite materials, such as cured and uncuredresin from equipment, finished surfaces, floors, hands of employees, or anyother surfaces.[OAC rule 3745-21-01(GG) and 40 CFR 63.5935]

   Cleaning material: a solvent used to remove contaminants and other materials such as dirt, grease, oil, and dried (e.g., depainting) or wet coating from a substrate before or after coating application; or from equipment associated with a coating operation, such as spray booths, spray guns, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both. [OAC rule 3745-21-01(D)]

   Composite: a shaped and cured part produced by using composite materials. [OAC rule 3745-21-01(GG) and 40 CFR 63.5935]

   Composite materials: the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.[OAC rule 3745-21-01(GG) and 40 CFR 63.5935]

   Exempt solvent: 1. volatile matter in a coating or cleaning material other than VOC or water. [OAC rule 3745-21-10(B)(5)] 2. any of the organic compounds that are specifically identified as exempt under the definition of “volatile organic compound” in paragraph (B)(16) of OAC rule 3745-21-01.

   Hazardous air pollutant (HAP):any air pollutant listed under Section 112(b) of the Clean Air Act (USC Section 7412).

   HAP-containing materials storage:an ancillary process within reinforced plastic composites production that involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets. [40 CFR 63.5935]

   Mold:a cavity or matrix into or onto which the composite materials areplaced and from which the product takes its form. [OAC rule 3745-21-01(GG) and 40 CFR 63.5935]

   Operation:a specific process typically found at a reinforced plasticcomposites facility. Examples of operations are noncorrosion-resistant manualresin application, corrosion-resistant mechanical resin application, pigmentedgel coat application, mixing, and VOC or HAP-containing materials storage. [OAC rule 3745-21-01(GG) and 40 CFR 63.5935]

   Organic compound (OC): any chemical compound containing carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides, metallic carbonates, ammonium carbonate, methane (except methane from landfill gases), and ethane. [OAC rule 3745-21-01(B)]

Solids: all nonvolatile matter in a coating material. Percent solids + percent volatile matter = 100%.

Toxic air contaminant (TAC):an air contaminant that has been identified by the Ohio EPA as having known toxicological effects, pursuant to ORC 3704.03(F)(3)(c). The complete list of toxic air contaminants regulated in Ohio can be found in OAC rule 3745-114-01.

Transfer efficiency (TE):the percentage of total coating solids employed bya coating applicator which adheres to the object being coated. [OAC rule 3745-21-01(D)]

Volatile matter: all non-solid matter in a coating material, including water. Percent solids + percent volatile matter = 100%.

Volatile organic compounds (VOC): a subset of organic compounds (OC)that participate in atmospheric photochemical reactions. Organic compounds that are specifically identified as *not* being "volatile organic compounds" are listed under the definition of "volatile organic compound" in paragraph (B)(16) of OAC rule 3745-21-01. When used in coating or cleaning materials, those compounds in the list just described are known as "exempt solvents."

VOC-containing materials storage:an ancillary process within reinforced plastic composites production that involves keeping VOC-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets. [OAC rule 3745-21-01(GG)]

C. Emissions Unit Terms and Conditions

1. P021, Mold Maintenance Repair Room

Operations, Property and/or Equipment Description:

Application of repair, cleaning, and mold release materials to molds used in the production of custom molded and other fiberglass products.VOC emissions are uncontrolled.

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

(1) b)(1)b., b)(1)c., b)(1)h., b)(2)b., b)(2)h, b)(2)i., d)(1), and e)(2)

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.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3) June 30, 2008 [Best AvailableTechnology (BAT)]	For volatile organic compound (VOC) emissions, the requirements of this rule are equivalent to the applicable requirements of 40 Part 63, Subpart WWWW. See b(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 [less than 10 tpy BAT exemption]	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)do not apply to theVOC emissionsfrom this air contaminant source, since the calculated annual emission rate is less than ten tons per yeartaking into account the voluntary restriction from OAC rule 3745-31-05(E). See b(2)b. below.
c.	OAC rule 3745-31-05(E) June 30, 2008 [Voluntary restrictions to avoid BAT]	Emissions of volatile organic compounds (VOC) shall not exceed 9.90 tons per year, based upon a rolling 12-month summation of the monthly emissions. See b(2)i. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-25 [Control of VOC emissions from reinforced plastic composite production operations]	Pursuant to paragraph (C)(1)(l) of this rule, the only affected operation for this emissions unit is "VOC-containing materials storage." See b)(2)c. below for the applicable work practice standard from Table 1 of this rule. Also see b(2)f. below.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) [National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production]	Pursuant to §63.5790(b) of this rule, the only affected operation for this emissions unit is "HAP-containing materials storage." See b)(2)d. below for the applicable work practice standard from Table 4 of this subpart. Also see b)(2)e. and b)(2)g. below.
f.	40 CFR Part 63, Subpart A (40 CFR 63.1-63.15) 40 CFR 63.5925 [General Provisions]	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
g.	OAC rule 3745-21-07 [Control of Emissions of Organic Materials from Stationary Sources]	Exempt, because pursuant to paragraph (A)(3) of OAC rule 3745-21-25, this emissions unit is not required to meet the requirements of OAC rule 3745-21-07.
h.	ORC 3704.03(F)(4) OAC rule 3745-114-01 [Toxic Air Contaminants]	Exempt - see b)(2)h. below.
i.	OAC rule 3745-17-11 [Restrictions on particulate emissions from industrial processes]	Exempt pursuant to paragraph (A)(1)(h) of this rule because this emissions unit has "surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings."

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements in b)(1)a. aboveapply 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. The exemption described in b)(1)b. above applies 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.

[Comment: For this emissions unit, "best available technology" was determined to be equivalent to the applicable portions of the WWWW MACT rule (40 CFR Part 63, Subpart WWWW). In this case, since BAT was *not* determined to be more stringent than an applicable rule, there will be no practical change for the permittee once the less than 10 tons per year BAT exemption applies, since the rule requirements will still apply.]

c. Pursuant to paragraph (D)(1) of OAC rule 3745-21-25, the permittee shall meet the following work practice standard from Table 1 of this rule:

i. Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

d. Pursuant to §63.5805(b) of 40 CFR Part 63, Subpart WWWW, the permittee shall meet the following work practice standard from Table 4 of this subpart:

i. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

e. Pursuant to §63.5835, paragraphs (a) and (c), of 40 CFR Part 63, Subpart WWWW, the permittee shall comply with the following general requirements:

i. Compliance at all times with the work practice standards in Table 4 to this subpart (see b)(2)d. above); and

ii. Operate and maintain the source according to §63.6, paragraph (e)(1)(i) of 40 CFR Part 63, Subpart A, which states, in part, "At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source...in a manner consistent with safety and good air pollution control practices for minimizing emissions...."

f. Pursuant to paragraphs (C)(2)(a) and (C)(2)(b) of OAC rule 3745-21-25, the following operations and associated materials are specifically excluded from any requirements in OAC rule 3745-21-25:

i. application of mold sealing and release agents; and

ii. mold stripping and cleaning.

g. Pursuant to paragraph (c) of 40 CFR 63.5790, the following operations and associated materials are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW:

i. application of mold sealing and release agents; and

ii. mold stripping and cleaning.

h. Pursuant to ORC 3704.03(F)(4)(e), ORC 3704.03(F)(4) and the document entitled "Review of New Sources of Air Toxics Emissions, Option A", do not apply to this air contaminant source (i.e., this emissions unit) since it is subject to a maximum achievable control technology (MACT) standard.

i. To ensure enforceability of the VOC emission limitation in b)(1)c. above during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC emissions levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC from P021 (tons)
1	0.83
1 - 2	1.66
1 - 3	2.49
1 - 4	3.32
1 - 5	4.15
1 - 6	4.98
1 - 7	5.81
1 - 8	6.64
1 - 9	7.47
1 - 10	8.30
1 - 11	9.13
1 - 12	9.90

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitationfor VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all materials containing any organic compound (OC) that are employed in thisemissions unit:

a. the name and/or identification number of each material employed (examples of material types include, but are not limited to, mold cleaners, mold release agents, mold repair resins, mold repair gel coats, catalysts, polishes, waxes, and general cleaning materials (aka cleanup solvents));

b. the number of pounds of each material employed, where number of pounds employed shall mean the net number of pounds, defined as the gross number of pounds employed during the month minus the number of pounds recovered and/or sent off-site for disposal during the month, such as is common for cleaning materials, for example;

c. the organic compound (OC) content, in weight percent, of each material employed;

d. the volatile organic compound (VOC) content, in weight percent, of each material employed;

[Comment: The VOC content will be the same as the OC content unless the material contains exempt solvents, in which case the weight percent of VOC will be the weight percent of OC minus the weight percent of exempt solvents.]

e. the monthly OC emissions, in pounds, for each material, to be calculated by multiplying the number of pounds from “b” above by the OC weight percent (as a decimal fraction) from “c” above;

f. the monthly VOC emissions, in pounds, for each material, to be calculated by multiplying the number of pounds from “b” above by the VOC weight percent (as a decimal fraction) from “d” above;

[Comment: The VOC emissions for mold repair materials containing styrene will be overstated when calculated by the method in “f” above. A more accurate method would be to use the Unified Emissions Factors (UEFs) for Open Molding of Composites. The UEFs account for the fact that a significant percent of styrene in these materials is not emitted, but rather remains in the thermoset polymer after curing. For this emissions unit, the UEFs have been intentionally ignored as a simplifying measure, because the amount of styrene-containing resin and gel coat materials used is less than 5% by weight of the total amount of VOC-containing materials used. The effect of ignoring the UEFs was estimated to overstate total VOC emissions by only 1%, which was considered insignificant.]

g. the total monthly OC emissions for this emissions unit, in tons; i.e., the summation of the OC emissions for each material from “e” above for all materials combined, converted from pounds to tons by dividing by 2000 pounds per ton;

h. the total monthly VOC emissions for this emissions unit, in tons; i.e., the summation of the VOC emissions for each material from “f” above for all materials combined, converted from pounds to tons by dividing by 2000 pounds per ton;

i. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling 12-month summation of OC emissions for this emissions unit, in tons, i.e., the summation of the monthly OC emissions from “g” above for the most recent month and the previous 11 months (see “k” below);

j. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling 12-month summation of VOC emissions for this emissions unit, in tons, i.e., the summation of the monthly VOC emissions from "h" above for the most recent month and the previous 11 months (see "k" below); and

k. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative OC and VOCemissionsfollowing the end of each calendar month.

[Comment: Only the subset of total organic compounds (OCs) that are defined as VOCs qualify for the less than 10 tons per year BAT exemption in OAC paragraph 3745-31-05(A)(3)(a)(ii), because the exemption applies only to "emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard has been adopted under the Clean Air Act" (VOCs are precursors for ozone). Because of this, only recordkeeping terms "d," "f," "h" and "j" above are necessary to demonstrate compliance with the voluntary restriction in b)(1)c. above. However, pursuant to OAC Chapter 3745-78 and ORC section 3745.11, the permittee is required to report the actual emissions of total OCs on an annual basis for the purpose of emissions fees. For this reason, the permittee has requested recordkeeping terms "c," "e," "g" and "i" above, plus the OC portion of "k" above, as additional voluntary requirements.]

(2) Pursuant to paragraph (O)(1)(a)(iv) of OAC rule 3745-21-25, the permittee shall demonstrate continuous compliance with the work practice standards in table 1 of the same rule by performing the work practice required for the affected operation (see b)(2)c. above). There are no applicable monitoring and/or data collection requirements associated with the demonstration of continuous compliance with this work practice standard.

(3) Pursuant to paragraph (P) of OAC rule 3745-21-25, the permittee shall comply with the following applicable recordkeeping requirements:

3745-21-25(P)(1)(a)	The permittee shall keep a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status.
3745-21-25(P)(1)(e)	The permittee shall keep a copy of a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
3745-21-25(P)(4)	The permittee shall retain all applicable records specified under paragraph (P)(1) of OAC rule 3745-21-25 for a period of not less than five years following the date of each report or record and shall be made available to the director of Ohio EPA or any authorized representative of the director for review during normal business hours.

(4) The permittee shall comply with the applicable recordkeeping requirements specified in 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5915(a)	The permittee shall keep a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements of 40 CFR 63.10(b)(2)(xiv).
63.5915(d)	The permittee shall keep a certified statement that operations are in compliance with the work practice requirements in Table 4 of this subpart, as applicable.
63.5920(a) - (d)	The permittee shall comply with the recordkeeping format and retention requirements specified in §63.5920.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly written reports of any deviations (excursions) from the following state-only required emission limitations:

a. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the VOC emissions levels specified in b)(2)i. above;

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling 12-month VOC emission limitation listed in b)(1)c. above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements in paragraph 9.b) of the Standard Terms and Conditions of this permit. The quarterly deviation reports may be submitted along with, or as part of, the quarterly deviation reports required by the facility's Title V permit.

(3) For this emissions unit (P021), there are no federally enforceable emissions limitations, operational restrictions, or control device operating parameter limitations. Therefore, the permittee shall not be required to submit quarterly deviation reports other than the reports required in e)(2) above.

(4) The permittee shall submit semi-annual deviation (excursion) reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit. The semi-annual deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and

Conditions of this permit. The semi-annual deviation reports may be submitted along with, or as part of, the semi-annual deviation reports required by the facility's Title V permit.

(5) The permittee shall submit semi-annual compliance status reports in accordance with paragraph (Q) of OAC rule 3745-21-25. These reports shall contain the following information:

a. company name and address;

b. statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from the applicable work practice standard for this emissions unit from Table 1 of OAC rule 3745-21-25 (see b)(2)c. above) during the reporting period, an affirmative statement to this effect; and

e. for each deviation from the applicable work practice standard from Table 1 of OAC rule 3745-21-25 (see b)(2)c. above), the compliance report shall contain the following information:

i. the total operating time of the effected operation during the reporting period; and

ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

Each compliance report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

The semi-annual compliance reporting requirement pursuant to paragraph (Q) of OAC rule 3745-21-25 may be satisfied by including and identifying the information in e)(5)a. – e)(5)e. above in the semi-annual deviation report submitted in accordance with e)(4) above.

(6) The permittee shall submit semi-annual compliance reports and other applicable notifications and reports as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

63.5860(a) and Table 9	Requirements for demonstrating initial compliance. See (6)a. below.
63.5905(a) and Table 13 63.9(b)(2)	Notification requirements and timing. For this emissions unit (P021), which is located at an existing source subject to this subpart, the only applicable requirement in Table 13 is for an Initial

	Notification, to be submitted in accordance with §63.9(b)(2).
63.5905(b)	Change(s) to any information submitted in any notification must be submitted within 15 calendar days after the change.
63.5910(a) - (b) and Table 14	Reporting requirements and timing. Includes the requirement for a semi-annual compliance report and, if applicable, an immediate startup, shutdown, and malfunction report.
63.5910(c) - (d) and Table 14	Requirements for the content of the semi-annual compliance report. See (6)b. below.
63.5910(g) and Table 14	Requirements and allowances regarding other semi-annual reports. See (6)c. below.
63.5910(h) and Table 14	Requirement to submit reports based on Table 14, not based on the requirements in §63.999.
63.5910(i)	Reporting requirements where multiple compliance options are available and the permittee has changed compliance options.

a. For this emissions unit (P021), pursuant to §63.5860(a) and Table 9 of Subpart WWWW, the permittee shall demonstrate initial compliance with the applicable work practice standard in Table 4 of Subpart WWWW (see b)(2)d. above) by submitting a certified statement in the Initial Notification that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

b. Pursuant to §63.5910(c) - (d) and Table 14 of Subpart WWWW, the semi-annual compliance report must contain the following information:

   i. company name and address;

   ii. statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

   iii. date of the report and beginning and ending dates of the reporting period;

   iv. if you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i);

v. if there were no deviations from the applicable work practice standard in Table 4 of Subpart WWWW (see b)(2)d. above), a statement that there were no deviations from the applicable work practice standard during the reporting period;

vi. if there were deviations from the applicable work practice standard in Table 4 of Subpart WWWW (see b)(2)d. above), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective actions taken.

c. Pursuant to §63.5910(g) of Subpart WWWW, the semi-annual compliance reporting requirement may be satisfied by including and identifying the information in §63.5910(c) – (d) and Table 14 in the semi-annual deviation report submitted in accordance with e)(4) above.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Emissions of volatile organic compounds (VOC) shall not exceed 9.9 tons per year, based upon a rolling 12-month summation of the monthly emissions.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the recordkeeping requirements in section d(1) above.

g) Miscellaneous Requirements

(1) None.