



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
STARK COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 15-01486**

**DATE: 2/7/2002**

A.R.E., Inc. - Massillon Vista  
Clyde Richey  
PO Box 1100  
Massillon, OH 44648-1100

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

Canton LAA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**FINAL PERMIT TO INSTALL****15-01486**

Application Number: 15-01486  
APS Premise Number: 1576131907  
Permit Fee: **\$200**  
Name of Facility: A.R.E., Inc. - Massillon Vista  
Person to Contact: Clyde Richey  
Address: PO Box 1100  
Massillon, OH 44648-1100

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**500 Vista Avenue SE**  
**Massillon, Ohio**

Description of proposed emissions unit(s):  
**Fiberglass plug mold.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**A.R.E., Inc. - Massillon Vista**  
**PTI Application: 15-01486**  
**Issued: 2/7/2002**

**Facility ID: 1576131907**

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	2.41
OC	7.3

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P201 - Fiberglass plug	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons per year.  The particulate emissions shall not exceed 2.41 tons/yr.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	The particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating, resin, catalyst, foaming agent and solvent employed;
  - b. the number of gallons of each coating, resin, catalyst, foaming agent and solvent employed;
  - c. the organic compound content of each coating, resin, catalyst, foaming agent and solvent, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings, resins, catalysts, foaming agents and solvents, in pounds per day. (The OC emission rates from resins shall be calculated using the emission factors for styrene emissions from resins application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "United Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association, and the Composites Institute, dated July 23, 2001. The OC emission rates from catalysts are based on the Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites by Robert A. Haberlein 3/24/99. The factor is 0.04% of the available DMP by weight, i.e. 0.04% x 34% of DMP by weight. The OC emissions from the foam agent are calculated using The Alliance for the Polyurethane Industry (API) "MD/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", 1999. The emission factor is 0.0000012 lb OC/lb PolyPro FR400);
  - e. the total number of hours the emissions unit was in operation per day; and
  - f. the average hourly organic compound emission rate for all coatings, resins, catalysts, foaming agents and solvents, i.e., (d)/(e), in pounds per hour (average).
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule

3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

AIR TOXIC ANALYSIS					
Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ )	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ )	Maximum Acceptable Ground Level Concentration (MAGLC), ( $\mu\text{g}/\text{m}^3$ )
P201	Styrene	85,029	1.38	1,439	2,024

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
  - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
  - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a

permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions from all coatings, resins, catalysts, foaming agents and solvents exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions from all coatings, resins, catalysts, foaming agents and solvents exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports

shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the allowable emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:  
8 lbs OC/hr

## Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.f.

- b. Emissions Limitation:  
40 lbs OC/day

## Applicable Compliance Method:

Compliance shall be determined based upon the following: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.d.

- c. Emissions Limitation:  
7.3 TPY OC

## Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section C.1.d of these terms and conditions and shall be the sum of the daily OC emissions rates for the calendar year divided by 2000 lbs/ton.

- d. Emissions Limitation:  
Visible particulate emissions from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

## Applicable Compliance Method:

Compliance with the visible emissions limitations shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996.")

- e. Emissions Limitation:  
The particulate emissions shall not exceed 0.551 lb/hr and 2.41 tons/yr.

## Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation may be used:

$$E = [\text{maximum coating solids usage rate (in pounds per hour)}] \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

TE = transfer efficiency = 30%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

13

**A.R.E**

**PTI A**

**Issued: 2/7/2002**

Emissions Unit ID: **P201**

CE = control efficiency = 95% (dry exhaust filtration system)

If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

2. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

#### **F. Miscellaneous Requirements**

None