



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

2/10/2016

Certified Mail

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: P0116452
Permit Type: Initial Installation
County: Stark

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

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, 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:	P0116452
Permit Type:	Initial Installation
Issued:	2/10/2016
Effective:	2/10/2016



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

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Final Permit-to-Install
A.R.E. Accessories, LLC
Permit Number: P0116452
Facility ID: 1576131793
Effective Date: 2/10/2016

Authorization

Facility ID: 1576131793
Facility Description: Manufacture of fiberglass truck caps and other products
Application Number(s): A0050144
Permit Number: P0116452
Permit Description: Initial installation PTI for an integrated fiberglass rail spray up booth located within a permanent total enclosure (PTE) that vents to an existing regenerative thermal oxidizer (RTO). Open molding process where chopped fiberglass and resin are applied using a non-atomized mechanical flow coater process.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 2/10/2016
Effective Date: 2/10/2016

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.

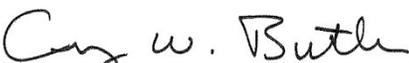
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Final Permit-to-Install
A.R.E. Accessories, LLC
Permit Number: P0116452
Facility ID: 1576131793
Effective Date: 2/10/2016

Authorization (continued)

Permit Number: P0116452

Permit Description: Initial installation PTI for an integrated fiberglass rail spray up booth located within a permanent total enclosure (PTE) that vents to an existing regenerative thermal oxidizer (RTO). Open molding process where chopped fiberglass and resin are applied using a non-atomized mechanical flow coater process.

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

Emissions Unit ID:	P020
Company Equipment ID:	Fiberglass Rail Spray-Up Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
A.R.E. Accessories, LLC
Permit Number: P0116452
Facility ID: 1576131793
Effective Date: 2/10/2016

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be 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, and reporting requirements 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 the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports 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 obtained before 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 entered upon 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.



Final Permit-to-Install
A.R.E. Accessories, LLC
Permit Number: P0116452
Facility ID: 1576131793
Effective Date: 2/10/2016

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) 5. below (Definitions)
 2. The following emissions unit contained in this permit is subject to OAC rule 3745-21-25, Control of VOC emissions from reinforced plastic composites production operations: P020. This rule is federally enforceable because the 11/11/2010 version was approved by U.S. EPA as part of the Ohio SIP, effective 8/12/2011.
 - a) Pursuant to paragraph (F)(1) of OAC rule 3745-21-25, this facility is an “existing facility” because it had at least one affected operation started-up prior to December 14, 2009.
 - b) As calculated in accordance with paragraph (F) of OAC rule 3745-21-25, the “VOC emissions threshold” for this facility is greater than 100 tons per year.
 - c) Pursuant to paragraph (D)(5) of OAC rule 3745-21-25, once a reinforced plastic composites production facility equals or exceeds the one hundred tons of VOC per year threshold on or after December 14, 2009, it is always subject to the requirements of paragraph (D)(3). The exception allowed in paragraph (D)(6) does not apply to this facility.
 3. The following emissions unit contained in this permit is subject to 40 CFR part 63, subpart WWWW, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production: P020 (SEE NOTE 1 BELOW)
 - a) Pursuant to §63.5795 of subpart WWWW, this facility is an “existing affected source” because construction commenced on or before August 2, 2001.
 - b) This facility was an existing major source of Hazardous Air Pollutants (HAPs) on or before the publication date of subpart WWWW in the Federal Register, which was April 21, 2003 [68 FR 19402].
 - c) Pursuant to §63.5840 of subpart WWWW, the facility is required to conduct initial performance tests and other initial compliance demonstrations, as applicable, by the initial compliance date. Pursuant to Table 2, item 1.a.i. to this subpart, the applicable initial compliance date for this facility was April 21, 2006 (i.e., three years after the publication date). The facility satisfactorily met all applicable initial performance tests and other initial compliance demonstrations by its compliance date, which was prior to the issuance of this permit.
 4. The following emissions unit contained in this permit is subject to 40 CFR part 63, subpart SS, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process: P020 (SEE NOTE 1 BELOW)
- NOTE 1: The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Canton City Health Department, Air Pollution Control Division.
5. Selected Definitions. Except where otherwise noted, the sources of following definitions are OAC rule 3745-21-01(GG) and/or §63.5935 of 40 CFR part 63, subpart WWWW.

Add-on control device: an air pollution control device, such as a thermal oxidizer or carbon adsorber that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Atomized mechanical application: means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

Cleaning: means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

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)]

Closed vent system: a system that is not open to the atmosphere and is composed of piping, ductwork, connections, and, if necessary flow inducing devices that transport gas or vapor from an emission point to a control device. [§63.981 of 40 CFR part 63, subpart SS]

Composite: a shaped and cured part produced by using composite materials.

Composite materials: means 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.

CR/HS: corrosion-resistant and/or high strength.

Exempt solvent: volatile matter in a coating or cleaning material other than VOC or water [OAC rule 3745-21-10(B)]. Organic compounds that are specifically identified as *not* being “volatile organic compounds” are listed under the definition of “volatile organic compound” in OAC rule 3745-21-01(B).

Gel coat: a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations (for “tooling gel coat,” see OAC rule 3745-21-01(GG)).

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.

Mechanical resin application: an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

Mixing: means the blending or agitation of resin or gel coat in vessels that are 5.00 gallons (18.9 liters) or larger, and includes the mixing of putties or polyputties. Mixing may involve the blending of resin or gel coat with filler, reinforcement, pigments, catalysts, monomers, and any other additives.

Mold: a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

Monomer: an organic compound that combines with itself or other similar compounds by a cross-linking reaction to become part of a cured thermoset resin.

Monomer content: the percent, by weight, of monomer (styrene, methyl methacrylate, and any other monomer) contained in the resin or gel coat prior to the addition of fillers, catalyst, and promoters.

Non-atomized mechanical application: the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been VOC emissions tested, and the test results showed that use of this application tool results in VOC emissions that are no greater than the VOC emissions predicted by the applicable nonatomized application equation(s) in table 1 to subpart WWW of 40 CFR 63. In addition, the device shall be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

Open molding: means a process for fabricating composites in a way that VOC containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold. The processes defined here as open molding shall not also be defined as surface coating processes [this sentence was added by the permit writer for clarification purposes].

Operation: a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and VOC-containing materials storage.

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)]

Plastic composite means the same as composite.

PTE (permanent total enclosure): a permanently installed enclosure that meets the criteria for a PTE in accordance with U.S. EPA method 204 specified within paragraph (C)(3)(c) of rule 3745-21-10 of the Administrative Code, and that directs all the exhaust gases from the enclosure to a control device. [OAC rule 3745-21-01(X)]

Reinforced plastic composites production: operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, VOC and HAP-containing materials storage, and repair operations associated with the production of plastic composites. It does

not include protective or decorative surface coating of cured parts [this sentence was added by the permit writer for clarification purposes].

Resin: any of a class of organic polymers of natural or synthetic origin used in reinforced plastic composite products to surround and hold fibers, and is solid or semi-solid in the cured state.

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.

Vapor-suppressed resin: a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

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 OAC rule 3745-21-01(B). 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.



Final Permit-to-Install
A.R.E. Accessories, LLC
Permit Number: P0116452
Facility ID: 1576131793
Effective Date: 2/10/2016

C. Emissions Unit Terms and Conditions

1. P020, Integrated Rail Spray Up Booth

Operations, Property and/or Equipment Description:

Fiberglass integrated rail spray up booth located within a permanent total enclosure (PTE) that vents to a regenerative thermal oxidizer (RTO). Open molding process where chopped fiberglass and resin are applied using a non-atomized mechanical flow coater process. Particulate emissions from the chopping of glass fibers are controlled by a dry filtration system using paint spray booth-type filters that also keep larger-size resin/glass materials out of the exhaust duct system as good engineering and good housekeeping practice.

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) 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 Available Technology (BAT)]	For emissions of volatile organic compounds (VOCs) that are also listed as organic hazardous air pollutants (HAPs), the requirements of this rule are equivalent to the applicable requirements of 40 CFR part 63, subpart WWWW. For emissions of volatile organic compounds (VOCs) that are not also listed as organic hazardous air pollutants (HAPs), the requirements of this rule are equivalent to the applicable requirements of OAC rule 3745-21-25. Particulate emissions with an aerodynamic diameter less than or equal to ten micrometers (PM ₁₀) shall be controlled by installing a dry filter system with a design control efficiency of at least 95% for PM ₁₀ . See b(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>June 30, 2008 [less than 10 tpy BAT exemption]</p>	<p>requirements under OAC rule 3745-31-05(A) 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 federally enforceable rule requirement of reducing the total VOC emissions by at least 95 percent by weight pursuant to OAC rule 3745-21-25(D)(3).</p> <p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀ emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable emissions limitation of 0.551 lb/hr established pursuant to OAC rule 3745-17-11.</p> <p>See b(2)b. below.</p>
c.	<p>OAC rule 3745-17-07(A)(1)</p>	<p>Visible particulate emissions from the RTO stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.</p>
d.	<p>OAC rule 3745-17-11(B)(1) [Restrictions on particulate emissions from industrial processes]</p>	<p>Particulate emissions (PE) shall not exceed 0.551 pounds per hour.</p> <p>See b)(2)c. below.</p>
e.	<p>OAC rule 3745-21-07 [Control of Emissions of Organic Materials from Stationary Sources]</p>	<p>Exempt - see b)(2)d. below.</p>
f.	<p>OAC rule 3745-21-25 [Control of VOC emissions from reinforced plastic composite production operations]</p> <p>[The requirements in paragraph (D)(3) of this rule apply because, in accordance with paragraph (F) of this rule, this emissions unit is located at an existing facility having</p>	<p>See b)(2)e. below.</p> <p>The permittee shall comply with the work practice standards from Table 1 to this rule, as applicable.</p> <p>See b)(2)f. below.</p> <p>Pursuant to paragraph (D)(3) of this rule, VOC emissions from the operation(s) in this emissions unit shall be reduced by at least 95% by weight.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>a VOC emissions threshold greater than 100 tons per year.]</p> <p>[The requirements in paragraph (D)(10) of this rule apply because an add-on control device will be used to comply with paragraph (D)(3) of the rule.]</p>	<p>See b)(2)h. below.</p> <p>Pursuant to paragraph (D)(10) of this rule, the permittee shall meet all applicable requirements contained in 40 CFR part 63, subpart SS for that the regenerative thermal oxidizer (RTO), and shall also establish each control device operating limit in subpart SS that applies.</p>
g.	<p>40 CFR part 63, subpart WWWW (40 CFR 63.5780-63.5935)</p> <p>[National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production]</p> <p>[In accordance with 40 CFR 63.5785, 63.5790, and 63.5795, this emissions unit is part of an existing reinforced plastic composites production facility that is located at a major source of HAP emissions. This emissions unit may include the following affected operations: open molding, cleaning of equipment used in reinforced plastic composites manufacture, and HAP-containing materials storage.]</p>	<p>The permittee shall comply with the work practice standards from Table 4 to this subpart, as applicable. [40 CFR 63. 5805(b)]</p> <p>See b)(2)g. below.</p> <p>The permittee shall comply with the organic HAP emissions limitations from Table 3 to this subpart, as applicable. [40 CFR 63. 5805(b)]</p> <p>See b)(2)i. below.</p> <p>The permittee shall comply with all applicable requirements contained in 40 CFR part 63, subpart SS, and shall also establish each control device operating limit in subpart SS that applies. [40 CFR 63. 5805(h) and 63. 5860(b)]</p> <p>The permittee shall comply with all applicable general requirements in §63.5835 of this subpart. (These are <u>not</u> the same as 40 CFR part 63, subpart A - General Provisions.)</p> <p>See b)(2)(j) below.</p>
h.	<p>40 CFR part 63, subpart SS (40 CFR 63.980-63.999)</p> <p>[National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process]</p> <p>[In accordance with 40 CFR 63.980, these provisions apply because another subpart (WWW) references the use of subpart SS for</p>	<p>The permittee shall comply with all applicable requirements contained in this subpart.</p> <p>See b)(2)k., d)(2), e)(4), and f)(2) below.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	the emission unit's control device, a regenerative thermal oxidizer (RTO).]	
i.	40 CFR part 63, subpart A (40 CFR 63.1-63.16) [General Provisions]	The General Provisions that apply are specified in Table 15 of 40 CFR part 63, subpart WWWW.
j.	ORC 3704.03(F)(4) OAC rule 3745-114-01 [Toxic Air Contaminants]	Exempt - see b)(2)l. below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements in b)(1)a. above apply 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 State Implementation Plan (SIP) for Ohio.
- b. The exemptions described in b)(1)b. above 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.

Comments:

Since "best available technology" for organic HAP VOC was determined to be equivalent to the applicable portions of 40 CFR part 63, subpart WWWW, there will be no practical change for the permittee once the less than 10 tons per year BAT exemption applies, since the subpart WWWW requirements will still apply.

Since "best available technology" for VOC that is not also organic HAP was determined to be equivalent to the applicable portions of OAC rule 3745-21-25, there will be no practical change for the permittee once the less than 10 tons per year BAT exemption applies, since the OAC rule 3745-21-25 requirements will still apply.

"Best available technology" for PM₁₀ was determined to be a dry filter system with a design control efficiency of at least 95% for PM₁₀. Since the permittee intends to use this same filter to comply with the 0.551 lb/hr particulate emissions limitation established pursuant to OAC rule 3745-17-11(B)(1) (and because all PE is assumed to be PM₁₀), there will be no practical change for the permittee once the less than 10 tons per year BAT exemption applies. See b)(2)c. below.

- c. The permittee shall meet the requirements of paragraph (B)(1) of OAC rule 3745-17-11 by installing and operating a control system for the control of particulate emissions whenever this emissions unit is in operation. The control system shall consist of a dry filter system with a design control efficiency of at least 95%. See c)(2)-c)(3) below.

Comment: Capture efficiency for particulate emissions is presumed to be 100% because of a separate requirement that this emissions unit be located within a permanent total enclosure (PTE) – see b)(2)h. below. Also, the permittee was already intending to use replaceable paint spray booth-type filters to keep larger-size resin/glass materials out of the exhaust duct system as good engineering and good housekeeping practice.

- d. This EU is exempt from the requirements of OAC rule 3745-21-07 pursuant to paragraph (A)(3) of this rule, because installation did not commence prior to the effective date of the rule, which was 2/18/2008.
- e. Unless otherwise specified in this permit or within OAC rule 3745-21-25, the permittee shall comply with all applicable requirements in OAC rule 3745-21-25 no later than the compliance date. For emissions unit P020, the applicable compliance date is the same as the startup date*, pursuant to paragraph (R)(1)(a) of this rule, which applies to affected operations for which installation commenced on or after 12/14/2009.
 *Comment: The startup date for emission unit P020 was 2/25/2014.
- f. The permittee shall comply with the applicable work practice standards from Table 1 in OAC rule 3745-21-25, including the following:

Type of operation	Work practice standards
2. Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. VOC-containing materials storage operation	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.

- g. The permittee shall comply with the applicable work practice standards from Table 4 in 40 CFR part 63, subpart WWWW, including the following:

Type of operation	Work practice standards
2. Cleaning operation (cleaning of	Do not use cleaning solvents that

equipment used in reinforced plastic composites manufacture)	contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. HAP-containing materials storage operation	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.

- h. The permittee shall meet the requirements of paragraph (D)(3) of OAC rule 3745-21-25 by locating this emissions unit within a permanent total enclosure (PTE) and by venting all VOC emissions to a regenerative thermal oxidizer (RTO) having a minimum control (destruction) efficiency of 95%. See c)(1) and c)(4)-c)(6) below.
 - i. The permanent total enclosure (PTE) shall be constructed to totally enclose the emissions unit such that all VOC emissions are captured, contained, and directed to the regenerative thermal oxidizer (RTO) control device. The PTE shall have a capture efficiency of 100% and shall meet the criteria established in U.S. EPA Method 204 (40 CFR 51, Appendix M, Method 204).
 - ii. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:
 - (a) Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4 \text{ area}/\pi)^{0.5}$$

- (b) The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e., the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

- (c) The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H₂O).
- (d) All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “(b),” shall be completely closed to any air movement during process operations.
- (e) All VOC emissions shall be captured and contained for discharge through the control device.

iii. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, part 51, Appendix M, Reference Method 204, and shall capture all of the OC, VOC, and organic HAP emissions from this emissions unit.

i. The permittee shall comply with the applicable organic HAP emissions limitations from Table 3 in 40 CFR part 63, subpart WWWW:

If your operation type is . . .	And you use . . .	¹Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton 171 lb/ton 123 lb/ton
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton 188 lb/ton 87 lb/ton
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton 157 lb/ton
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton 238 lb/ton
5. open molding—shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton 215 lb/ton 180 lb/ton
6. open molding—gel	a. tooling gel coating	440 lb/ton



coat ³	b. white/off white pigmented gel coating	267 lb/ton
	c. all other pigmented gel coating	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

¹Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

j. The permittee shall comply with the applicable general requirements of 40 CFR part 63, subpart WWWW, including the following sections:

63.5835(a)	Requirement to be in compliance at all times with the work practice standards in Table 4 to this subpart.
63.5835(b)	Requirement to be in compliance with all organic HAP emissions limits in this subpart that you are meeting using add-on controls, except during periods of startup, shutdown, and malfunction.
63.5835(c)	Requirement to operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i).
63.5835(d)	Requirement to develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3) for any organic HAP emission limits you meet using add-on control.

k. The permittee shall comply with the applicable requirements of 40 CFR part 63, subpart SS, including the following sections:

63.982(a)	General compliance requirements for storage vessels, process vents, transfer racks, and equipment leaks where emissions are vented through a closed vent system to a flare, a nonflare control device, or routing to a fuel gas
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	system or process.
63.982(a)(2)	Specific compliance requirements for process vents venting emissions through a closed vent system.
63.982(c)	Specific requirements for a closed vent system and nonflare control device.
63.982(c)(2)	Additional specific requirements, as applicable for process vents venting emissions through a closed vent system to a nonflare control device.

Additional applicable requirements from subpart SS are shown below under the appropriate section of this permit: d) Monitoring and Recordkeeping Requirements, e) Reporting Requirements, and f) Testing Requirements.

- I. Pursuant to ORC 3704.03(F)(4)(e), the rules from 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.

c) Operational Restrictions

- (1) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizer (RTO), for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (2) The permittee shall install and operate a dry particulate filter system for the control of particulate emissions from the open molding operations in this emissions unit. The dry particulate filter system shall be employed during all periods of fiberglass spray up. The permittee shall operate and maintain the dry particulate filter system in accordance with the manufacturer's recommendations, instructions, and/or operating manuals, with any modifications deemed necessary by the permittee.
- (3) In the event that the dry particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry particulate filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements.
- (4) Natural gas shall be the only fuel used in the in the regenerative thermal oxidizer (RTO) serving this emissions unit.
- (5) For a permanent total enclosure using a differential pressure gauge to demonstrate compliance:

- a. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.
- (6) OR instead of (5) above, for permanent total enclosures using an air flow monitor to demonstrate compliance:
 - a. The permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation; and
 - b. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.
- d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR part 63, subpart WWWW, including the following sections:

63.5810	Options for meeting the standards for open molding operations. See d)(3) below in this permit.
63.5855	Requirement to monitor and operate all add-on control devices in accordance with 40 CFR part 63, subpart SS.
63.5895	Requirements for monitoring and collecting data to demonstrate continuous compliance.
63.5900	Requirements for demonstrating continuous compliance with the applicable standards.
63.5915	Recordkeeping requirements.
63.5920	Recordkeeping format and retention requirements.

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR part 63, subpart SS, including the following sections:

63.983(b)	Closed vent system inspection and monitoring requirements.
63.983(c)	Closed vent system inspection procedures.
63.983(d)	Closed vent system leak repair provisions.

63.988	Incinerators, boilers, and process heaters: equipment and operating requirements, performance test requirements, and monitoring requirements. See f)(2) of this permit for performance test requirements pursuant to subpart SS.
63.988(c)(1)	Requirements for the location of a temperature monitoring device.
63.996	General monitoring requirements for control and recovery devices.
63.996(c)	Operation and maintenance of continuous parameter monitoring systems (CPMS).
63.998	Recordkeeping requirements.
63.998(a)(2)	Nonflare control device performance test records.
63.998(a)(2)(ii) (B)(1)	For thermal incinerators, requirement to record the fire box temperature averaged over the full period of the performance test. As applicable for this permit, “thermal incinerator” means the regenerative thermal oxidizer (RTO), and “fire box temperature” means the combustion temperature.
63.998(a)(2)(ii) (B)(4)	Requirement to record the percent reduction of organic regulated material achieved by the incinerator. As applicable for this permit, “incinerator” means the regenerative thermal oxidizer (RTO).
63.998(b)	Continuous records and monitoring system data handling requirements.
63.998(c)(2)	Control and recovery device regulated source monitoring records.

- (3) Having chosen to demonstrate that all individual resin or gel coat materials, as applied and including add-on controls, meet the applicable emissions limit in Table 3 to 40 CFR part 63, subpart WWWW, the permittee shall collect and record the following information each month, in accordance with §63.5810(a) of subpart WWWW:
- a. the identification and description of each process stream used in the open molding operation in this emissions unit, where process stream is defined as each individual combination of resin or gel coat and application technique. Each process stream description shall include the following:
 - i. the operation type from among the six open molding operation types in the first column of Table 3 of 40 CFR part 63, subpart WWWW;
 - ii. the expanded description of the application method and material type from among the combinations shown in the second and third columns of Table 1 of 40 CFR part 63, subpart WWWW; and

- iii. the organic HAP content of the resin or gel coat material, in percent by weight. The organic HAP content of the catalyst material shall not be included.
 - b. for each process stream identified in “a” above:
 - i. the applicable organic HAP emissions factor* (EF) from Table 1 of 40 CFR part 63, subpart WWWW, expressed as pounds of organic HAP per ton of material used;
*This is the uncontrolled emissions factor.
 - ii. the add-on control factor, defined as 1 minus the control efficiency** (expressed as a decimal fraction) of the regenerative thermal oxidizer (RTO) based on the most recent performance test that demonstrated compliance;
**Control efficiency for the RTO is also known as the destruction efficiency.
 - iii. the controlled emissions factor, calculated by multiplying the uncontrolled emissions factor from “i” above by the add-on control factor from “ii” above; and
 - iv. the applicable organic HAP emissions limit from Table 3 of 40 CFR part 63, subpart WWWW, expressed as pounds of organic HAP per ton of material used.
 - c. for each process stream identified in “a” above,
 - i. the amount of resin or gel coat used during the month, in tons; and
 - ii. the organic HAP emissions, in pounds, calculated by multiplying the tons of resin or gel coat used from “i” above by the controlled emissions factor calculated in “b.iii” above.
 - d. if more than one process stream was identified in “a” above, the permittee shall record the total organic HAP emissions from all resin and gel coat materials used in this emissions unit during the month by summing the results from “c.ii” above.
- (4) The permittee shall collect and record the following information each month for the cleaning materials used in this emissions unit in order to demonstrate compliance with the applicable work practice standards from Table 1 in OAC rule 3745-21-25 and from Table 4 to 40 CFR part 63, subpart WWWW:
- a. the name and/or identification number of each cleaning material employed;
 - b. the name and CAS No., if applicable, of each individual organic hazardous air pollutant (HAP) contained in each cleaning material identified in “a” above;
 - c. the content, in pounds per gallon, of each individual organic HAP in each cleaning material identified in “a” above;

- d. the VOC content, in pounds per gallon, of each cleaning material identified in “a” above;
 - e. the net volume, in gallons, of each cleaning material identified in “a” above that is employed during the month, where net volume means the amount that is lost through evaporation; i.e., the gross number of gallons used minus the number of gallons recovered and/or sent off-site for disposal during the month*;

*A daily log may be required for recovered waste cleaning materials in situations where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered material added to the container.
 - f. the monthly emissions of each individual HAP, in pounds, for each cleaning material identified in “a” above, to be calculated by multiplying the content of each individual HAP in pounds per gallon from “c” above by the net volume employed from “e” above.
 - g. the monthly emissions of all HAPs, in pounds, for each cleaning material identified in “a” above;
 - h. the monthly VOC emissions, in pounds, from each cleaning material identified in “a” above, to be calculated by multiplying the VOC content from “d” above by the net volume employed from “e” above;
 - i. if more than one cleaning material is employed during the month, the total monthly emissions of each individual HAP, in pounds, from all cleaning materials employed;
 - j. if more than one cleaning material is employed during the month, the total monthly emissions of all HAPs, in pounds, from all cleaning materials employed; and
 - k. if more than one cleaning material is employed during the month, the total monthly VOC emissions, in pounds, from all cleaning materials employed.
- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor* and recorder that measures and records the combustion temperature within the regenerative thermal oxidizer (RTO) when the emissions unit(s) being controlled by it is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature

measured during the most recent performance test that demonstrated the emissions unit(s) was/were was in compliance; and

- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

*The continuous temperature monitor and recorder is described in general as a continuous parameter monitoring system (CPMS).

- (6) Whenever the monitored average combustion temperature within the RTO deviates from the range or limit established in accordance with this permit (based on a 3-hour block of time, as recorded in d)(5)a. above), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Canton City Health Department, Air Pollution Control Division (Canton APC). The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (7) Requirements for the permanent total enclosure:
- a. The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
 - i. the measured diameter of each natural draft opening;
 - ii. the distance measured from each natural draft opening to each VOC emitting point;
 - iii. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
 - iv. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
 - v. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

AND, if using differential pressure gauge(s) and a recorder to demonstrate ongoing compliance:

- b. The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- i. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

- ii. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

OR instead of b. above, if the permittee chooses to conduct weekly facial velocity checks using an air flow monitor to demonstrate ongoing compliance:

- c. The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

- (8) Pursuant to paragraph (O) of OAC rule 3745-21-25, "Demonstration of continuous compliance and the associated monitoring and data collection requirements," the permittee shall comply with the following applicable requirements:

3745-21-25(O)(1)(a)(i)	The permittee shall demonstrate continuous compliance with VOC emissions limits for affected operations using add-on control devices by following the procedures in 40 CFR part 63, subpart SS, which include the use of continuous parameter monitors. See d)(5) above.
3745-21-25(O)(1)(a)(iv)	The permittee shall demonstrate compliance with the work practice standards in Table 1 of this rule by performing the work practice standards for the affected operations. See b)(2)f. above.
3745-21-25(O)(1)(b)	The permittee shall report each deviation from each VOC control requirement in paragraph (D) of this rule that applies. The deviations shall be reported according to paragraph (Q) of this rule. These requirements shall be satisfied by the monitoring and recordkeeping requirements in d)(4) – d)(6) above and the reporting requirements in e)(5) below.
3745-21-25(O)(1)(d)	Because the permittee is using an add-on control device to meet the applicable VOC control requirements in

	<p>paragraph (D) of this rule, the permittee shall not be required to meet the VOC control requirement during periods of startup, shutdown, or malfunction, but shall operate the affected operation to minimize emissions to the greatest extent which is consistent with safety and good air pollution control practice..</p>
<p>3745-21-25(O)(1)(e)</p>	<p>Deviations that occur during a period of malfunctions for those affected operations and standards specified in paragraph (O)(1)(d) of this rule are not violations if the permittee demonstrates to the director's satisfaction that the permittee was operating in accordance with (O)(1)(d) of this rule. The director will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations.</p>
<p>3745-21-25(O)(2)(a)</p>	<p>Because the permittee is using an add-on control device, the permittee shall during production collect and keep a record of data as indicated in 40 CFR part 63, subpart SS, and shall monitor and collect the following data:</p> <p>(i) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the controlled operation is operating.</p> <p>(ii) The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for the purposes of this rule, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system.</p> <p>(iii) At all times, the permittee shall maintain necessary parts for routine repairs of the monitoring equipment.</p> <p>(iv) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused by poor maintenance or careless operation are not malfunctions.</p>

- (9) 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 this rule, including all documentation supporting any applicability or compliance status.
3745-21-25(P)(1)(b)	For the add-on control device, the permittee shall keep all records required in 40 CFR part 63, subpart SS.
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 this rule, as applicable.
3745-21-25(P)(4)	The permittee shall retain all applicable records specified under paragraph (P)(1) of this rule for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report or record and all such records shall be made available to the director of Ohio EPA or any authorized representative of the director for review during normal business hours.

(10) Monitoring and recordkeeping requirements for the dry particulate filter system:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, with any modifications deemed necessary by the permittee.
- b. The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, with any modifications deemed necessary by the permittee. The periodic inspections shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.
- c. In addition to the periodic inspections described above, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down, and perform any needed maintenance and repair to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system by maintaining a record that includes the following information:
 - i. the date of the inspection;
 - ii. a description of each/any problem identified and the date it was corrected;

- iii. a description of the maintenance and repairs performed; and
 - iv. the name of the person who performed the inspection.
 - e. The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service or was not operated in accordance with the manufacturer’s recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee, when the emissions unit was in operation.
 - f. The permittee shall maintain the record keeping required by terms “a” thru “e” above on site for a period of not less than five years.
- (11) For each day during which the permittee burns a fuel other than natural gas in the RTO serving this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

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 requirement in paragraph (S)(2) of OAC rule 3745-21-25 for the permittee to submit a written notification stating that emissions unit P020 is an affected operation subject to that rule has been satisfied by the application submitted for this permit.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR part 63, subpart WWWW, including the following sections:

63.5900(b)	Requirement to report each deviation from each applicable standard in §63.5805 according to the requirements in §63.5910.
63.5905 and Table 13	Requirements for submitting notifications.
63.5910 and Table 14	Requirements for submitting semiannual compliance reports and immediate startup, shutdown, and malfunction reports.
63.5910(g)	Requirements regarding the semiannual compliance status report required by subpart WWWW and the semiannual monitoring report required by the facility’s Title V permit: allowances to avoid redundant reporting.

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR part 63, subpart SS, including the following sections:

63.999(a)	Performance test notifications and reports requirements.
63.999(b)(3)	Notification of compliance status—requirements for the operating range for monitored parameters.
63.999(c)	Periodic reports requirements.

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the dry particulate filter system was not in service or was not operated in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee;
 - b. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the regenerative thermal oxidizer (RTO) serving this emissions unit;
 - c. all days during which a fuel other than natural gas was burned in the RTO, plus the type and quantity of fuel burned.
 - d. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
 - e. each incident of deviation described in "a," "b," "c," or "d" where a prompt investigation was not conducted;
 - f. each incident of deviation described in "a," "b," "c," or "d" where prompt corrective action that would bring the emissions unit into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in "a," "b," "c," or "d" where proper records were not maintained for the investigation and/or the corrective action(s).
 - h. for permanent total enclosures using pressure gauge(s) to demonstrate ongoing compliance:
 - i. The permittee shall identify in the quarterly deviation report all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.
 - i. OR instead h. above, for permanent total enclosures using an air flow monitor to demonstrate ongoing compliance, the permittee shall identify the following in the quarterly deviation report:

- i. all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure;
- ii. all periods of time during which an access door and/or window, not qualifying as a natural draft opening, was left open during operations; and
- iii. all weekly average facial velocity readings at natural draft openings that were less than 200 feet per minute.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements 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.

- (6) The permittee shall submit semiannual compliance status reports in accordance with paragraph (Q)(1) of OAC rule 3745-21-25. The semiannual compliance status report shall be submitted no later than thirty calendar days after the end of each six month period ending on June thirtieth or December thirty-first.

Pursuant to paragraph (Q)(5) of OAC rule 3745-21-25, the semiannual compliance status report shall be submitted along with, or as part of, the semiannual monitoring report required by the facility's Title V permit. If the semiannual compliance status report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, then submission of the semiannual compliance status report shall be deemed to satisfy any obligation to report the same deviations in the Title V semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements.

Pursuant to paragraph (Q)(3) of OAC rule 3745-21-25, the semiannual compliance status report 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 any VOC emissions limitations and operating limits that apply, and there were no deviations from the work practice standards in Table 1 of OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;
- e. if there were no periods during which a continuous monitoring system (CMS) was out of control (including but not limited to the continuous parameter monitoring system (CPMS) for the RTO), a statement that there were no periods during

which a continuous monitoring system (CMS) was out of control during the reporting period;

- f. for each deviation from a VOC emissions limitation or operating limit, and for each deviation from a work practice standard that that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating limit, or work practice standard in OAC rule 3745-21-25, the compliance report shall include the following information:
 - i. the total operating time of each affected 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.
- g. for each deviation from a VOC emissions limitation or operating limit that occurs at an affected operation where a continuous monitoring system (CMS) is used to comply with the VOC emissions limitation or operating limit in OAC rule 3745-21-25, the compliance report shall include the following information:
 - i. if applicable, the date and time that each malfunction started and stopped;
 - ii. if applicable, the date and time that each CMS was inoperative, except for zero (low-level) and high-level checks;
 - iii. if applicable, the date, time, and duration that each CMS was out of control, as defined in paragraph (c)(7) of 40 CFR 63.8, including information in paragraph (c)(8) of 40 CFR 63.8;
 - iv. the date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;
 - v. a summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period;
 - vi. a breakdown of the total duration of the deviation during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes
 - vii. a summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period;
 - viii. an identification of each VOC that was monitored at the affected source;

- ix. a brief description of the affected operations
 - x. a brief description of the CMS,
 - xi. the date of the latest CMS certification or audit, and
 - xii. a description of any changes in CMS processes, or controls since the last reporting period.
- h. where multiple compliance options are available, the permittee shall state in this compliance report if there has been a change in the compliance option since the last compliance report.

f) Testing Requirements

- (1) The permittee shall comply with the applicable testing and compliance requirements pursuant to 40 CFR part 63, subpart WWWW, including the following sections:

63.5840	Timing requirements for initial performance test or other initial compliance demonstration. The timing requirements in §63.5840 shall <u>not</u> apply. Instead, the timing requirements specified in section f)(4)b.iii. of this permit shall apply.
63.5845	Timing requirement for conducting subsequent performance tests. See f)(4)b.iv. below.
63.5850	Requirements for conducting performance tests, performance evaluations, and design evaluations.
63.5860(a)	Requirement to demonstrate initial compliance with each applicable organic HAP emissions standard in §63.5805(a) - (h) by using the procedures in Tables 8 and 9 to this subpart.
63.5860(b)	Requirement to establish each applicable control device operating limit in 40 CFR part 63, subpart SS.

- (2) The permittee shall comply with the applicable performance test and compliance assessment requirements pursuant to 40 CFR part 63, subpart SS, including the following sections:

63.988(b)	Performance test requirements.
63.997	Performance test requirements for control devices, except the timing requirements in §63.997(c) shall <u>not</u> apply. Instead, the timing requirements

	specified in section (f)(4)b.iii of this permit shall apply.
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(3) 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. Control Requirement:

VOC emissions from the operation(s) in this emissions unit shall be reduced by at least 95% by weight.

Applicable Compliance Method:

Compliance shall be demonstrated by performance testing as described in f)(4) below.

b. Emissions Limitations:

Pounds of organic HAP emissions per ton of resin or gel coat applied, based on a 12-month rolling average. Table 3 to 40 CFR part 63, subpart WWWW shows which organic HAP emissions limit applies based upon the type of operation and the method of resin application or type of gel coat.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in d)(3) above.

c. Emission Limitation:

Do not use cleaning materials (i.e., cleaning solvents) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaning solvents used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(4) above.

d. Emission Limitation:

Do not use cleaning materials (i.e., cleaning solvents) that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP-containing cleaning solvents may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(4) above.

e. Emission Limitation:

Visible particulate emissions from the RTO stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

In the paragraph above, “except as provided by rule” means the following: Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except:

- i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes, but shall not exceed 60 percent opacity, as a six-minute average, at any time; and
- ii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations at the RTO stack performed in accordance U.S. EPA Method 9 [Method 9 of 40 CFR part 60, Appendix A].

f. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

According to OAC rule 3745-17-11, the allowable hourly emissions rate for particulate emissions is to be selected as the more stringent of two results as determined by using Table I and Figure II, which are found in the appendix to the rule. The rule also states, however, that Figure II does not apply to sources having an uncontrolled mass emission rate of less than 10 lb/hr. As estimated in the calculations below, the uncontrolled potential to emit for particulate emissions from the chopping of fiberglass in this emissions unit is about 5.3 lb/hr, so Figure II does not apply. Instead, Table I was be used to determine the allowable hourly emissions rate based on process weight rate (PWR). The applicable PWR for emissions unit P020 was calculated as shown below.

Emissions unit P020 uses a flow coating process, which is categorized as a non-atomized mechanical application process. So for this EU, we can assume that there are no particulate emissions from resin overspray. According to AP-42, Section 4.4, the only potential particulate emissions would come from the automatic glass-fiber chopping process, but that “these emissions have not been

quantified.” For the purpose of this permit, an engineering estimate was made that only 0.1% of each glass fiber unit length is subject to the chopping process, so the applicable PWR should be based on only 0.1% of the total fiberglass usage rate. As provided by the permittee in the permit application, the maximum fiberglass usage rate is 5265 lb/hr, so the applicable PWR was calculated as follows:

$$(0.1\%)(5265 \text{ lb/hr})_{\text{FIBERGLASS}} = 5.265 \text{ lb/hr} \approx 0.003 \text{ ton/hr}$$

The emission limitation that was obtained from Table I of OAC rule 3745-17-11 was based on the estimated PWR of 0.003 ton/hr, for which the following formula applies:

$$\text{For } 0 < (P) < 0.05, (E) = 0.551$$

where:

P = the process weight rate (PWR) in ton/hr; and

E = the allowable rate of particulate emissions in lb/hr

Compliance with the hourly PE limitation is demonstrated by the following calculations representing the maximum potential-to-emit:

A conservative assumption was made that the portion of the glass fibers subject to the chopping process (estimated to be 0.1% of each glass fiber’s unit length) would all become airborne particulate matter (PM). In other words, the uncontrolled particulate emissions were assumed to equal 100% of the process weight rate (as estimated above). For BAT purposes, it was also assumed that all of the PM is PM₁₀.

$$(5265 \text{ lb}_{\text{FIBERGLASS}}/\text{hr}) \times (0.1\%_{\text{AIRBORNE PM}_{10}}) = 5.265 \text{ lb}_{\text{PM}_{10}}/\text{hr}_{\text{BEFORE CONTROLS}}$$

$$(5.265 \text{ lb}_{\text{PM}_{10}}/\text{hr}_{\text{BEFORE CONTROLS}}) \times (1 - 95\% \text{ CE}) = 0.26 \text{ lb}_{\text{PM}_{10}}/\text{hr}_{\text{AFTER CONTROLS}}$$

Comparison to Emissions Limitation:

$$(0.26 \text{ lb}_{\text{PM}_{10}}/\text{hr})_{\text{AFTER CONTROLS}} < 0.551 \text{ lb}_{\text{PE}}/\text{hr}$$

(where all PE is assumed to be PM₁₀ or smaller)

Therefore, provided compliance is demonstrated with the particulate control requirements in this permit, compliance with this particulate emissions limit shall be assumed.

- (4) The permittee shall conduct, or have conducted, performance testing for this emissions unit in accordance with the following requirements:
 - a. Except as otherwise stated in “b” below, the permittee shall comply with the applicable testing requirements pursuant to OAC rule 3745-21-25, 40 CFR part 63, subpart WWWW (63.5780-5935), and 40 CFR part 63, subpart SS (40 CFR 63.980-999).

- b. Requirements for the timing of initial performance testing and the frequency of additional testing shall be as follows:
- i. Paragraph (R)(4) of OAC rule 3745-21-25 requires performance testing to demonstrate initial compliance to be conducted within 90 days after the compliance date, which the rule defines as the startup date for “affected operations” for which installation commenced on or after 12/14/2009. For emissions unit P020, the startup date was 2/25/2014, so the 90-day deadline for performance testing was 5/26/2014. Because the effective date of this permit is after the deadline established by OAC rule 3745-21-25, this deadline shall not apply to emissions unit P020. Instead, see “iii” below.
 - ii. §63.5840 of 40 CFR part 63, subpart WWWW, requires performance testing to demonstrate initial compliance to be conducted within 180 days after the compliance date, which is defined as the startup date for “new sources that use add-on controls to initially meet compliance.” As used here, “new sources” means those emissions units installed after the applicable compliance date for the facility, which, pursuant to item 1.a. i. in Table 2 to subpart WWWW, was April 21, 2006. For emissions unit P020, the startup date was 2/25/2014, so the 180-day deadline for performance testing was 8/24/2014. Because the effective date of this permit is after the deadline established by subpart WWWW, this deadline shall not apply to emissions unit P020. Instead, see “iii” below.
 - iii. The timing of initial performance testing for emissions unit P020 shall not be based on the startup date for this emissions unit, nor on the effective date of this permit. Rather, the requirements for initial performance testing for this emissions unit shall be satisfied by the testing that will be required within 6 months after the effective date of the Title V renewal operating permit for this facility.
 - iv. The requirements in §63.5845 of 40 CFR part 63, subpart WWWW, for the permittee to conduct a performance test every 5 years following the initial performance test for any standard that the permittee is meeting with an add-on control device shall be combined with the 5-year testing frequency that will be required in the Title V renewal operating permit for this facility.
 - v. In addition to the 5-year testing frequency described in “iv” above, additional testing may be required by the director of Ohio EPA or Canton City Health Department, Air Pollution Control Division (CCHD, APCD) if necessary to ensure continued compliance, pursuant to paragraph (R)(5) of OAC rule 3745-21-25.
- c. The performance testing shall be conducted to demonstrate compliance with the permanent total enclosure (PTE) capture efficiency of 100%, the minimum RTO control (destruction) efficiency of 95% by weight for emissions of VOC and organic HAP, and to determine the average RTO operating temperature during

the testing that demonstrated compliance with the 95% minimum control (destruction) efficiency requirement.

d. Test methods:

i. Compliance with the 100% capture efficiency requirement for the permanent total enclosure (PTE) shall be demonstrated using Method 204 from 40 CFR Part 51, Appendix M, and Method 2 from 40 CFR Part 60, Appendix A. The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "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.)

(a) During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

(b) Method 2 from 40 CFR part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the enclosure through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$$FV = (Q_o - Q_i) / A_n$$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all natural draft openings in the enclosure.

(c) If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least

once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

- (d) The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:
 - (i) the diameter of each natural draft opening;
 - (ii) the distance measured from each natural draft opening to each VOC emitting point in the process;
 - (iii) the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;
 - (iv) the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling; and
 - (v) the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.
- ii. The control (destruction) efficiency (i.e., the percent reduction in VOC 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.
- iii. The combustion temperature within the RTO shall be measured and recorded continuously during the emissions testing period(s). Following the completion of the emissions testing, the average of the temperatures that were measured and recorded as just described shall be computed and included in the summary portion of the written test report described in "h" below.
- e. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating, and under those representative conditions that challenge to the fullest extent possible the facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (Canton APC). Although this generally consists of operating the emissions units at maximum

material input/production rates and results in the highest emission rates of the tested pollutants, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Canton APC. 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 Canton APC's refusal to accept the results of the emission test(s).

Pursuant to paragraph (S)(3) of OAC rule 3745-21-25, emissions unit P020 is an affected operation that is vented to an add-on control device to meet a VOC emissions requirement specified within this rule; therefore, the permittee shall submit an intent to test that is in accordance with the procedures of paragraph (A) OAC rule 3745-21-10 and that includes the test procedures specified within OAC rule 3745-21-10.

- g. Personnel from Canton, APC 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(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.
- h. 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 Canton APC 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 Canton APC.

g) Miscellaneous Requirements

- (1) Optional: Recommended additional recordkeeping for total organic compound (OC) emissions.

Background:

As described in the Definitions in Section B. of this permit (Facility-Wide Terms and Conditions, paragraph 3), some materials contain *exempt solvents*, which are organic compounds (OCs) that have been identified as being exempt from the definition of "VOC" for regulatory purposes because they do not participate in photochemical reactions. Acetone is an example of an OC that is not a VOC. For a given liquid material, the total organic compound (OC) content equals the sum of the VOCs and any exempt solvents.

Only VOCs, not total OCs are regulated in the terms and conditions of this permit, pursuant to OAC rule 3745-21-25. Therefore, the monitoring and recordkeeping



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requirements necessary to demonstrate compliance include only VOCs. However, total OC emissions are needed for the annual Fee Emission Report.

As described in term A.4 of the Standard Terms and Conditions of this permit, there is a rule-based requirement in OAC Chapter 3745-78 for the permittee to report the actual emissions of total OCs on an annual calendar year basis for the purpose of emissions fees; i.e., the annual Fee Emission Report (FER). For this reason, it is highly recommended that the permittee maintain records of the total OC content and usage-based OC emissions for all OC-containing materials in addition to the recordkeeping required in this permit pertaining to organic HAPs and VOCs.