



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

11/9/2016

Certified Mail

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

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

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

Facility ID: 0285000291  
 Permit Number: P0121028  
 Permit Type: Initial Installation  
 County: Wayne

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

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

3. Facility Emissions and Attainment Status:

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

4. Source Emissions:

Initial FEPTIO permit for the modification of gelcoat booth R012 (previous issued PTI P0118895), which will become a resin flow coat booth, and the installation of one new gelcoat spray booth, R024. Emissions are controlled by a 50,000 cfm Regenerative Thermal Oxidizer (RTO) which then vents through a stack to the outside.

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

The Volatile Organic Compound (VOC) emissions from emissions units R004-R007, R012-R016, and R018-R024, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Emissions of Hazardous Air Pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R024, all De Minimis units, and units exempt from the requirement to obtain a permit-to-install, shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

5. Conclusion:

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



6. Please provide additional notes or comments as necessary:

None.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (R004-R007, R012-R016, and R018-R024)	58.40
Single HAP (facility-wide)	9.50
Combined HAP (facility-wide)	24.50
VOC (Styrene for R012 & R024)	1.27

## PUBLIC NOTICE

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

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

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

17494 Dover Road,, Mount Eaton, OH 44659

ID#:P0121028

Date of Action: 11/9/2016

Permit Desc:Initial FEPTIO permit for the modification of gelcoat booth R012 (previous issued PTI P0118895), which will become a resin flow coat booth, and the installation of one new gelcoat spray booth, R024. Emissions are controlled by a 50,000 cfm Regenerative Thermal Oxidizer (RTO) which then vents trough a stack to the outside..

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





**DRAFT**

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

Facility ID:	0285000291
Permit Number:	P0121028
Permit Type:	Initial Installation
Issued:	11/9/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





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

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	12
1. Emissions Unit Group - Coating Booths: R012 and R024. ....	13





**Draft Permit-to-Install and Operate**  
A.R.E. Accessories, LLC - Mount Eaton Facility  
**Permit Number:** P0121028  
**Facility ID:** 0285000291  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0285000291  
Application Number(s): A0056220  
Permit Number: P0121028  
Permit Description: Initial FEPTIO permit for the modification of gelcoat booth R012 (previous issued PTI P0118895), which will become a resin flow coat booth, and the installation of one new gelcoat spray booth, R024. Emissions are controlled by a 50,000 cfm Regenerative Thermal Oxidizer (RTO) which then vents through a stack to the outside.  
Permit Type: Initial Installation  
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/9/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0121028

Permit Description: Initial FEPTIO permit for the modification of gelcoat booth R012 (previous issued PTI P0118895), which will become a resin flow coat booth, and the installation of one new gelcoat spray booth, R024. Emissions are controlled by a 50,000 cfm Regenerative Thermal Oxidizer (RTO) which then vents through a stack to the outside.

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

**Group Name: Coating Booths**

<b>Emissions Unit ID:</b>	<b>R012</b>
Company Equipment ID:	Resin Flow Coat Spray Booth
Superseded Permit Number:	P0118895
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R024</b>
Company Equipment ID:	Gelcoat Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
A.R.E. Accessories, LLC - Mount Eaton Facility  
**Permit Number:** P0121028  
**Facility ID:** 0285000291  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Draft Permit-to-Install and Operate**  
A.R.E. Accessories, LLC - Mount Eaton Facility  
**Permit Number:** P0121028  
**Facility ID:** 0285000291  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



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

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

(1) None.

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

(1) c)(1)a, c)(2)a, c)(2)b, e)(1), e)(2), f)(1) and g)(1)

c) Applicable Emissions Limitations and/or Control Requirements

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

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

(2) Additional Terms and Conditions

a. Emissions of hazardous air pollutants (HAPs) from emissions units R004-R007, R012-R016, R018-R024, all de minimis units and units exempt from the requirement to obtain a permit-to-install and operate shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

b. The volatile organic compound (VOC) emissions from emissions units R004-R007, R012-R016 and R018-R024, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

d) Operational Restrictions

(1) None.

e) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly VOC emissions for R004-R007, R012-R016 and R018-R024, combined, in tons.

- (2) The permittee shall maintain monthly records of the following information:
- a. the company name and identification number of each coating, cleanup material, release material, gelcoat, resin and sealer employed;
  - b. the individual HAP content of each coating, cleanup material, release material, gelcoat, resin and sealer employed, in pounds/gallon and for each gelcoat and resin employed, in weight percent;
  - c. the number of gallons of each coating, cleanup material, release material, gelcoat, resin and sealer employed;
  - d. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons;
  - e. the total HAP emissions, in pounds or tons, for all the coating, cleanup material, release material, gelcoat, resin and sealer employed; and
  - f. the rolling, 12-month summation of the total monthly HAP emission, in tons.

The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation in e)(2)c.

f) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. HAP emissions shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP;
    - ii. HAP emissions shall not exceed 24.5 tons per year as a rolling, 12-month summation for total combined HAPs;
    - iii. VOC emissions shall not exceed 58.40 tons per year as a rolling, 12-month summation; and
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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



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

g) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in B.1.c)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions from emissions units R004-R007, R012-R016 and R018-R024, combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated based upon the record keeping requirements specified in e)(1).

b. Emission Limitation:

Emissions of HAPs from emissions units R004-R007, R012-R016, R018-R024, all de minimis units and units exempt from the requirement to obtain a permit-to-install and operate shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

Applicable Compliance Method:

Compliance with these annual emission limitations shall be demonstrated based upon the record keeping requirements specified in e)(2).

h) Miscellaneous Requirements

(1) None.



**Draft Permit-to-Install and Operate**  
A.R.E. Accessories, LLC - Mount Eaton Facility  
**Permit Number:** P0121028  
**Facility ID:** 0285000291  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Coating Booths: R012 and R024.**

EU ID	Operations, Property and/or Equipment Description
R012	Resin flow coat booth with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO). Formerly a gelcoat station and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO).
R024	Mechanical Spray-Up of Gelcoat in an Open Mold controlled by regenerative thermal oxidizer (RTO). Formerly TMP199489.

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

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

a. d)(1), d)(2), d)(3), d)(4) and e)(5)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	Volatile organic compound (VOC) emissions shall be controlled by a regenerative thermal oxidizer (RTO) with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.  See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	The emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(F).  See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emissions rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(F).  See b)(2)c.
d.	OAC rule 3745-21-25(G)(3)	Work Practice Standards in Table 1 and VOC Emissions Limits in Table 2 for Open Molding: Non-CR/HS for R012 and Open Molding: Gel Coat for R024.  See b)(2)f and c)(3).
e.	OAC rule 3745-114-01	See d)(1), d)(2), d)(3), d)(4) and e)(5).
f.	OAC rule 3745-17-07(A)	See b)(2)g.
g.	OAC rule 3745-17-11(A)	See b)(2)h and b)(2)i.

(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.
- b. The best available technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
  - e. The PTE associated with this emissions unit shall demonstrate that it meets the criteria established for a PTE in Method 204. The permittee shall perform an additional demonstration to show that the PTE cannot be compromised under normal plant conditions when the emissions unit is in operation [i.e., the air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE are opened]. After the compliance demonstration required in f)(2)a, the permittee will not be required to perform any additional monitoring, record keeping, reporting or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
  - f. VOC emissions shall not exceed 267 lbs/ton for white/off white pigmented gel coat, 377 lbs/ton for all other pigmented gel coat and 88 lbs/ton for mechanical resin application based on a 12-month rolling average.
  - g. In accordance with OAC rule 3745-17-07(A)(3)(h), the visible particulate emission limitation established in OAC 3745-17-07(A)(1) shall not apply to this emissions unit.
  - h. In accordance with OAC rule 3745-17-11(A)(2)(a)(ii), "Figure II" in the appendix to this rule shall not apply to any source with an uncontrolled mass rate of emission of less than ten pounds per hour.
  - i. In accordance with OAC rule 3745-17-11(A)(2)(b)(ii), "Table I" in the appendix of this rule shall not apply to any source which is located within the counties specified in paragraphs (B)(2) and (B)(3) of this rule.
- c) **Operational Restrictions**
- (1) The emissions from this emissions unit shall be vented to the RTO at all times the emissions unit is in operation.
  - (2) The permittee shall operate and maintain the RTO at all times in accordance with the manufacturer's recommendations, instruction and/or operating manual(s), with any modification deemed necessary by the permittee.
  - (3) The permittee shall implement the appropriate work practice standards from Table 1 and the VOC emission limits from Table 2 of OAC rule 3745-21-25.
  - (4) This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:



**Draft Permit-to-Install and Operate**

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

**Permit Number:** P0121028

**Facility ID:** 0285000291

**Effective Date:** To be entered upon final issuance

- a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
- b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;
- c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
- d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
- e. the direction of air flow through all NDO's shall be into the enclosure;
- f. all access doors and windows whose areas are not included in section c)(4)b and are not included in the calculations in section c)(4)c shall be closed during routine operation of the process; and
- g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The FEPTIO application for this/these emissions unit(s), R012 and R024, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";  
or

- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Styrene

TLV (mg/m<sup>3</sup>): 85.2

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 8.10

MAGLC (ug/m<sup>3</sup>): 2028.63

The permittee, has demonstrated that emissions of Styrene, from emissions unit(s) R012 and R024, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (5) The permittee shall maintain monthly records of the following information:
  - a. the company name and identification number of each cleanup material, gelcoat, and resin employed;

- b. the number of gallons of each cleanup material, gelcoat, and resin employed;
- c. the VOC content of each cleanup material, gelcoat, and resin employed; and
- d. the rolling, 12-month average of the total monthly VOC emission, in ton/month.
- e. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW and multiplying by (1 - control efficiency);
- f. calculated weighted average VOC emissions limit for the last 12 months (using the equation presented in OAC rule 3745-21-25(G)(3)(a));
- g. calculate the weighted average VOC emission factor (using the equation presented in OAC rule 3745-21-25(G)(3)(b)); and
- h. if each rolling, 12-month average VOC emission factor in “f” and “g” above is less than or equal to the corresponding rolling, 12-month average VOC emission.

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

Note: These calculations shall be performed using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the thermal oxidizer, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall conduct periodic inspections of the thermal oxidizer 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the thermal oxidizer and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

- (8) The permittee shall document each inspection (periodic and annual) of the dehydrator and shall maintain the following information:
  - a. the date of the inspection;



- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the weighted average VOC hourly and annual emission limitations specified in sections b)(1) and b)(2).

- (4) The permittee shall include, in the PER, a description of any changes made to the PTE.
  - (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated by the record keeping requirements specified in d)(5).
  - (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
    - b. The RTO associated with these emissions units was last stack tested on February 16, 2016. Subsequent emission testing shall be conducted to demonstrate compliance with the established emission limitations approximately 2.5 years after this date and within 6 months prior to the permit expiration.

- c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 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.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
  - g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.
- (3) The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.
- g) Miscellaneous Requirements
- (1) None.