



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

9/3/2008

Certified Mail

Kathy Royle
A.R.E. Accessories, LLC - Mount Eaton Fa
400 NAVE RD S.E.
PO BOX 1100
MASSILLON, OH 44648

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285000291
Permit Number: 02-22964
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 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate 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 and Operate 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)425-9171.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

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

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This facility manufactures FRP products, including truck caps and related products. All of the normal FRP related emissions units are utilized from hand lay-up to gelcoat and polyester resin spray-up. To fix molding errors and put the finishing touches on the products, sanding and repair areas exist. Once the product is manufactured it is painted. This involves painting the FRP as well as some metal pieces.

The plant is divided into two areas. The first includes some of the FRP processes and the coating operations and is controlled by a RTO. The other area contains five units related to FRP manufacturing and is not controlled.

Due to the above-mentioned operations and the fact that this facility has a PTE for HAPs greater than major source thresholds, the facility would be subject to the MACT rules listed below on the respective compliance dates if synthetic minor limits were not obtained:

Subpart MMMM "Misc. Metal Parts and Products" (Surface Coating), January 2, 2007;

Subpart PPPP "Plastic Parts" (Surface Coating), April 19, 2007

Subpart WWWW "Reinforced Plastic Composites Production", April 21, 2006

3. Facility Emissions and Attainment Status:

This facility is located in Wayne County which is attainment for all criteria pollutants. The following are the PTEs for this facility which are currently federally enforceable or true PTE:

OC/VOC = 58.40 TPY (permitted units) 53.07 TPY (de minimis or PTI exempt units)

PM10 = 12.97 TPY (permitted units) 63.66 TPY (de minimis or PTI exempt units)

NOx = 18.34 TPY (permitted units)

CO = 90.92 TPY (permitted units)

SO2 = 0.02 TPY (permitted units)

HAPs = no federally enforceable limit, so technically the same as OC/VOC above

Because it is impossible to determine the true PTE for most of the de minimis or exempt units, 1.83 TPY was used for de minimis units (10 lbs/day, 365 days/yr) and 4.51 TPY was used for PE for the exempt units (0.03 gr/dscf, 4,000 cfm, 8,760 hrs/yr). These values over-inflate the emissions from these units tremendously.

The following are the requested synthetic minor limits:

OC/VOC = 58.40 TPY (permitted units), 41.10 TPY (de minimis or PTI exempt units)

PM10 = 12.97 TPY (permitted units) 86.53 TPY (de minimis or PTI exempt units)

NOx = 18.34 TPY (permitted units)

CO = 90.92 TPY (permitted units)

SO2 = 0.02 TPY (permitted units)

HAPs = 24.5 TPY (permitted and de minimis or PTI exempt units)
Single HAP = 9.5 TPY (permitted units and de minimis or PTI exempt units)

4. Source Emissions:

Actual or allowable emissions increased for CO and SO₂ is occurring due to this PTI. The PTI is being written to include potential changes to the RTO which would show increases in potential CO and SO₂ limits and to provide federally enforceable, rolling limits.

5. Conclusion:

These limits will effectively restrict the facility-wide PTE to less than major source thresholds so that this facility will not be subject to any of the upcoming MACTs and will be able to get out of the Title V permitting program.

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>
PE/PM ₁₀	99.5
OC/VOC	99.5
CO	90.92
NO _x	18.34
SO ₂	0.02

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
A.R.E. Accessories, LLC - Mount Eaton Fa

Issue Date: 9/3/2008
Permit Number: 02-22964
Permit Type: Initial Installation
Permit Description: Paint spray booth.
Facility ID: 0285000291
Facility Location: A.R.E. Accessories, LLC - Mount Eaton Fa
17494 Dover Road,
Mount Eaton, OH 44659
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Richard Smith at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

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

Facility ID: 0285000291
Permit Number: 02-22964
Permit Type: Initial Installation
Issued: 9/3/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285000291
Application Number(s): A0003131
Permit Number: 02-22964
Permit Description: Paint spray booth.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 9/3/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

Ohio 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 43087
(330)425-9171

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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 02-22964
Permit Description: Paint spray booth.

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

R017

Paint Spray Booth No. 5

Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

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 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 02-22964

Facility ID: 0285000291

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R017, Paint Spray Booth No. 5

Operations, Property and/or Equipment Description:

Paint spray booth no. 5 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer

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. b)(1)d (see b)(2)j below)

(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 operations(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. 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 b)(2)a, b)(2)b, b)(2)c and b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)e, b)(2)f, and b)(2)h.
c.	OAC rule 3745-21-07(G)	The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)i below.
d.	OAC rule 3745-21-07(M)	The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)j below.
e.	OAC rule 3745-21-09(U)	The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100 percent by weight and a minimum destruction efficiency of 95 percent by weight.
- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- c. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, 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.
- d. The OC/VOC emissions from emissions units R006, R007, R012, R013, R014, R016, and R017, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- e. The OC/VOC emissions from emissions units R006 through R017, combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- f. Emissions from natural gas combustion from the ovens associated with emissions units R006, R007, and R017, and from the RTO, combined, shall not exceed the following:

particulate matter less than	0.24 ton per year
10 microns in diameter (PM-10)	
nitrogen oxides (NOx)	18.34 tons per year
carbon monoxide (CO)	90.92 tons per year
sulfur dioxide (SO2)	0.02 ton per year
OC/VOC	0.17 ton per year

- g. The emission limitations specified in b)(2)f represent the potential to emit for these units. Therefore, no monitoring or record keeping requirements are required to demonstrate compliance with these limits.
- h. Emissions of hazardous air pollutants (HAPs) from emissions units R006 through R017 and all de minimis units* and units exempt from the requirement to obtain a permit-to-install** shall not exceed 9.5 tons per year, as a rolling, 12-month



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

* as defined in OAC rule 3745-15-05

** pursuant to OAC rule 3745-31-03

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

- i. OAC rule 3745-21-07(G) shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.
- j. OAC rule 3745-21-07(M) shall be effective and federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-07(M) as a revision to the Ohio SIP for organic compounds.

c) Operational Restrictions

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



the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.

- (2) The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
- (3) The permittee shall collect and record the following information each day for emissions units R006, R007, and R017, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC/VOC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total controlled OC/VOC emission rate for all coatings and cleanup materials, in pounds per day [i.e., the summation of (b x c) for each of the coatings and cleanup materials x (1-overall control efficiency)];

Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation. The overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance shall be used in this calculation.
 - e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
 - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
- (4) The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units R006, R007, R012, R013, R014, R016, and R017, combined.
- (5) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R006 through R017, combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from section A.III.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
- (6) The permittee shall collect and record the following information each month for emissions units R006, R007, and R017, combined:
 - a. the company name and identification number of each coating and cleanup material employed;



- b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
- c. the number of gallons of each coating and cleanup material employed;
- d. the total controlled emissions of each individual HAP, in pounds, for all coatings and cleanup materials employed [i.e., summation of (b x c) for each individual HAP for all the coatings and cleanup materials employed x (1-overall control efficiency)];

Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation. The overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance shall be used in this calculation.

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

e) Reporting Requirements

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

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

- (2) The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in b)(2)d and the annual emission limitations specified in b)(2)e and b)(2)h.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) and b)(2) 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 determined by stack testing in accordance with f)(2) below and OAC rule 3745-21-10(C).

b. Emission Limitation:

The OC/VOC emissions from emissions units R006, R007, R012, R013, R014, R016, and R017, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in d)(3) and d)(4) above.

The annual emission limitation was created by multiplying the hourly emission limitation by 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly emission limitation is shown, compliance with the annual emission limitation will be assumed.

c. Emission Limitation:

The OC/VOC emissions from emissions units R006 through R017, 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 determined by the record keeping specified in d)(5) above.

d. Emission Limitation:

Emissions of HAPs from emissions units R006 through R017 and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any single HAP and 24.5 tons per year, as a rolling, 12-month summation for all HAPs combined.

Applicable Compliance Method:

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

e. Emission Limitation:

Emissions from natural gas combustion from the ovens associated with emissions units R006, R007, and R017, and from the RTO combined shall not exceed the following:



PM-10	0.24 tons per year
NOx	18.34 tons per year
CO	90.92 tons per year
SO2	0.02 tons per year
OC/VOC	0.17 tons per year

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with R006, R007, and R017, and emission factors provided by the manufacturer for the RTO.

- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
 - a. The emissions testing shall be conducted in accordance with the date specified in the Permit to Operate (PTO).
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in b)(2)a.
 - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), 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's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.
 - 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 approved alternative test protocol. 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 Northeast District Office of Ohio EPA.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods



and procedures, the emissions units 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 Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

- g. Personnel from the Northeast District Office of Ohio EPA 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 test and submitted to the Northeast District Office of Ohio EPA 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 Northeast District Office of Ohio EPA.

- (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.