



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/24/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

15-76-13-1793
A.R.E., Inc.- Massillon
Ralph Gatti
P.O. Box 1100
Massillon, OH 44648

Dear Ralph Gatti:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Very truly yours,

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

cc: Canton Division of Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 04/24/02

Effective Date: 04/24/02

Expiration Date: 04/24/07

This document constitutes issuance of a Title V permit for Facility ID: 15-76-13-1793 to:

A.R.E., Inc.- Massillon

400 Nave Road

Massillon, OH 44648

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Paint/Spray Booth #1)

Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

K002 (Paint/Spray Booth #2)

Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

K003 (Paint/Spray Booth #3)

Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

K004 (Paint/Spray Booth #4)

Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

P001 (Exterior Gelcoat Spray-Up)

Gelcoat is sprayed into a concave mold.

P002 (Resin Spray-Up Station #1)

Polyester resin and chopped fiberglass are sprayed into concave mold.

P003 (Resin Spray-Up Station #2)

Polyester resin, fillers and chopped fiberglass are sprayed into concave mold.

P006 (Sanding & Grinding Area)

Raw reinforced fiberglass plastic caps, lids and accessories are lightly sanded and wiped with lacquer thinner in small areas and occasionally sprayed in a small area with lacquer primer.

P009 (Final Prep Area (Wipe Cleaning))

Raw reinforced fiberglass plastic caps, lids and accessories are prepared for painting by wiping the outer surface with a cleaning solvent.

P010 (Paint Mix Room)

Coatings are custom mixed in one gallon cans for each product.

P011 (Mold Maintenance Booth)

Mold cleaning and release application booth.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Canton Division of Air Pollution Control

420 Market Avnue N.

Canton, OH 44702-1544

(330) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

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

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based

on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

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

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P005 - paint gun cleaners;
P007 - lid grinding booth;
P012 - touch-up area (PTI 15-01463);
P013 - cap-rail gluing (PTI 15-01463);
P014 - lid rubber seal application (PTI 15-01463);
P015 - lid plastic trim (PTI 15-01463);
T001 - resin storage tank #1;
T002 - resin storage tank #2;
Z301 - mold maintenance;
Z303 - fossliner booth A;
Z304 - resin mix tank;
Z305 - filler resin day tank;
Z306 - neet resin day tank;
Z307 - repair sanding booth;
Z308 - returns and Repair Booth #1;
Z309 - returns and Repair Booth #2;
Z310 - natural gas-fired space heaters;
Z311 - fossliner booth B;
Z313 - railing patchwork;
Z314 - railing adhesive sealant;
Z315 - final assembly line #1;
Z316 - final assembly line #2; and
Z401 - R&D booth (prototype) cutting and grinding.

Each insignificant unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

B. State Only Enforceable Section (continued)

2. This permit to install for emissions units K001-K004, P001-P003, P006, P007, P009, P010, T001 and T002 (the emissions from all of these emissions units, with the exception of P006, P007 and P009, are captured and vented to a common thermal oxidizer called the RTO) was evaluated based on the actual materials and the design parameters of these emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install applications and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant(s):

Pollutant: dimethyl phthalate

TLV (ug/m3): 5,000

Maximum Hourly Emission Rate (lbs/hr): 2.433

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24.37

MAGLC (ug/m3): 119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
- b. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that is proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (V)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint/Spray Booth #1 (K001)

Activity Description: Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #1 and cure oven for coating fiberglass parts, controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and exhaust filters	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	<p>The volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>The organic compound (OC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>See section A.1.2.a below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	<p>The OC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>The VOC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>(These allowables represent the maximum production capacity of this emissions unit; therefore, no record keeping is required to demonstrate compliance.)</p> <p>The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11, and 3745-21-07(G)(2).</p> <p>See sections A.I.2.b, A.I.2.c, and A.I.2.d below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The OC emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. (These emission limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled. The OC emission limit (85% overall control efficiency) that applies when the peel coat emissions are vented to the RTO is less stringent than PTI 15-01409.)</p> <p>See section A.I.2.e below.</p>
	OAC rule 3745-17-07(A)(1)	<p>Visible particulate emissions from the RTO stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11	<p>Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.</p>

2. Additional Terms and Conditions

- 2.a** The emission limitations of 1.8 tons/month and 21.6 tons/yr of VOC and 1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004, combined, shall be achieved by restricting material usage and VOC/OC content as indicated in the following table:

Material Description	Usage Restriction (gallons/month)	VOC/OC Content (lbs/gallon)
base coat/primer	7,759	6.74
clear coat	4,667	3.57
cleanup solvent	185 (net)	6.60
maintenance peel coat (water-based)	116.7	0.23
maintenance peel coat (solvent-based)	10	5.90

- 2.b** As part of BAT, the minimum capture efficiency for the OC emissions shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight. The OC emissions from the application of a peel coat do not have to be captured.
- 2.c** This emissions unit shall be totally enclosed such that all the VOC and OC emissions, except those emissions from the peel coats when they are not being vented to the RTO, are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in 40 CFR Part 60, Appendix A, 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The peel coat may be applied during periods when the RTO is not operating.

II. Operational Restrictions

1. The permittee shall employ a dry exhaust filtration system, when this emissions unit is in operation, to catch overspray before it enters the ductwork leading to the RTO.
2. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC and OC emissions are captured. Compliance with the following criteria, identified by 40 CFR Part 60, Appendix A, Method 204, shall be met by the permittee:
 - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, A.III.5, and A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information for each day peel coats are applied and not vented to the RTO:
 - a. the company identification of each peel coat employed;
 - b. documentation as to whether or not a peel coat is applied on a day when fiberglass parts are being coated;
 - c. the number of gallons of each peel coat employed;
 - d. the OC content of each peel coat, in pounds per gallon;
 - e. the total OC emission rate, in pounds per day;
 - f. the total number of hours the peel coats were being applied; and
 - g. the average hourly OC emissions rate, i.e., (e)/(f), in pounds per hour (average).
3. The permittee shall maintain records of the hours of operation of this emissions unit and the maintenance performed on the RTO.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when the emissions unit is in operation and during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, and K004:

- a. the name and identification number of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent employed;
- b. the VOC and OC contents of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent, as applied, in pounds per gallon;
- c. the number of gallons of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat and cleanup solvent employed;
- d. the number of gallons of each cleanup solvent recovered;
- e. the number of gallons of net usage of each cleanup solvent, in tons (the total of (c) minus (d));
- f. the total uncontrolled VOC and OC emission rates for all base coats/primers and clear coats, in tons (the summation of (b) times (c) for all base coats/primers and clear coats);
- g. the calculated, controlled VOC and OC emission rates for all base coats/primers and clear coats, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- h. the total uncontrolled VOC and OC emission rates for all cleanup solvents employed, in tons (the summation of (e) times (b) for all cleanup solvents);
- i. the calculated, controlled VOC and OC emission rates for all cleanup solvents, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- j. the total uncontrolled VOC and OC emission rates for all water-based peel coats and solvent-based peel coats employed, in tons (the summation of (b) times (c) for all peel coats);
- k. the total VOC and OC emissions from all base coats/primers, clear coats, water-based peel coats, solvent-based peel coats, and cleanup solvents employed, in tons (the summation of (g) plus (i) plus (j))
[Note: Base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent usages do not have to be recorded for individual emissions units. Paint mix data may be used to approximate the monthly paint usage and VOC and OC emissions for K001, K002, K003, and K004.]; and
- l. the total usages of all base coats/primers, all clear coats, all cleanup solvents (net usage), all water-based peel coats, and all solvent-based peel coats, in gallons.

NOTE: To simplify the record keeping, it is assumed the peel coats are uncontrolled throughout the year.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5 and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following limits:
 - a. the base coat/primer usage restriction of 7,759 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - b. the clear coat usage restriction of 4,667 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - c. the VOC/OC content limitation of 6.74 lbs/gallon for each base coat/primer;
 - d. the VOC/OC content limitation of 3.57 lbs/gallon for each clear coat;
 - e. the net cleanup solvent usage restriction of 185 gallons/month for emissions units K001, K002, K003, and K004, combined (net = gross minus waste disposal);
 - f. the VOC/OC content limitation of 6.60 lbs/gallon for the cleanup solvent;
 - g. the water-based maintenance peel coat usage restriction of 116.7 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - h. the VOC/OC content limitation of 0.23 lb/gallon for each water-based maintenance peel coat;
 - i. the solvent-based maintenance peel coat usage restriction of 10 gallons/month for emissions units K001, K002, K003, and K004, combined;
 - j. the VOC/OC content limitation of 5.90 lbs/gallon for each solvent-based maintenance peel coat; and
 - k. the VOC/OC emission limitation of 1.8 tons/month for emissions units K001, K002, K003, and K004 combined.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in section A.II.2 of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the usage of peel coat exceeded 8 lbs/hr and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the usage of peel coat exceeded 40 lbs/day and the actual OC emissions for each such day; and
 - c. an identification of each day during which both peel coat was applied and base coat/primer or clear coat was applied to fiberglass parts.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
7. The permittee shall submit annual reports, by April 15 of each year, of the total VOC/OC emissions from emissions units K001, K002, K003, and K004, combined, in tons.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.V.2, A.V.3, A.V.4 and A.V.5. The testing requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

1.8 tons/month and 21.6 tons/yr of VOC from emissions units K001, K002, K003, and K004 combined

1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section A.III.5 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

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

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.c Emissions Limitation:

2.41 tons/yr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.d Emissions Limitation:

20% opacity, as a 6-minute average, from the RTO stack

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2.e Emissions Limitation:

1.84 lbs/hr of VOC emissions from emissions unit K001

1.84 lbs/hr of OC emissions from emissions unit K001

(does not include emissions from peel coat applications)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following one-time calculation (for worst-case VOC emissions) and a 95% control efficiency:

Basecoat

3.66 gal/hr x 6.74 lbs of VOC/gal = 24.67 lbs of VOC/hr

Clearcoat

2 gal/hr x 3.57 lbs of VOC/gal = 7.14 lbs of VOC/hr

Cleanup

2 flushes/hr x 2.5 lbs of VOC/flush = 5 lbs of VOC/hr

Total

24.67 + 7.14 + 5 = 36.81 lbs of VOC/hr x 0.05 = 1.84 lbs of VOC/hr

2.f Emissions Limitations:

8.06 tons/yr of VOC emissions from emissions unit K001

8.06 tons/yr of OC emissions from emissions unit K001

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2.g Emissions Limitation:

Each base coat/primer employed shall contain no more than 6.74 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.h Emissions Limitation:

Each clear coat employed shall contain no more than 3.57 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

V. Testing Requirements (continued)

2.i Emissions Limitation:

Each cleanup solvent employed shall contain no more than 6.60 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.j Emissions Limitation:

Each water-based maintenance peel coat employed shall contain no more than 0.23 lb/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.k Emissions Limitation:

Each solvent-based maintenance peel coat employed shall contain no more than 5.9 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.l Emissions Limitations:

8 lbs/hr of OC
40 lbs/day of OC

(These limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled.)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.2.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

The maximum amount of base coat/primer employed each month shall not exceed 7,759 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.b Usage Restriction:

The maximum amount of clear coat employed each month shall not exceed 4,667 gallons for emissions units K001, K002, K003, and K004, combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

V. Testing Requirements (continued)

3.c Usage Restriction:

The maximum amount of cleanup material employed each month (net) shall not exceed 185 gallons (net = gross minus waste disposal) for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.d Usage Restriction:

The maximum amount of water-based maintenance peel coatings employed each month shall not exceed 116.7 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.e Usage Restriction:

The maximum amount of solvent-based maintenance peel coatings employed each month shall not exceed 10 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.f Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.g Operational Limitation:

95% VOC destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.1.2.b.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
 - d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s).
5. The VOC content of each coating and cleanup material employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint/Spray Booth #2 (K002)

Activity Description: Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #2 and cure oven for coating fiberglass parts, controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and exhaust filters	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	<p>The volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>The organic compound (OC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>See section A.1.2.a below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	<p>The OC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>The VOC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>(These allowables represent the maximum production capacity of this emissions unit; therefore, no record keeping is required to demonstrate compliance.)</p> <p>The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11, and 3745-21-07(G)(2).</p> <p>See sections A.I.2.b, A.I.2.c, and A.I.2.d below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The OC emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. (These emission limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled. The OC emission limit (85% overall control efficiency) that applies when the peel coat emissions are vented to the RTO is less stringent than PTI 15-01409.)</p>
	OAC rule 3745-17-07(A)(1)	<p>See section A.I.2.e below.</p> <p>Visible particulate emissions from the RTO stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11	<p>Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.</p>

2. Additional Terms and Conditions

2.a The emission limitations of 1.8 tons/month and 21.6 tons/yr of VOC and 1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004, combined, shall be achieved by restricting material usage and VOC/OC content as indicated in the following table:

Material Description	Usage Restriction (gallons/month)	VOC/OC Content (lbs/gallon)
base coat/primer	7,759	6.74
clear coat	4,667	3.57
cleanup solvent	185 (net)	6.60
maintenance peel coat (water-based)	116.7	0.23
maintenance peel coat (solvent-based)	10	5.90

- 2.b** As part of BAT, the minimum capture efficiency for the OC emissions shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight. The OC emissions from the application of a peel coat do not have to be captured.
- 2.c** This emissions unit shall be totally enclosed such that all the VOC and OC emissions, except those emissions from the peel coats when they are not being vented to the RTO, are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in 40 CFR Part 60, Appendix A, 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The peel coat may be applied during periods when the RTO is not operating.

II. Operational Restrictions

- 1.** The permittee shall employ a dry exhaust filtration system, when this emissions unit is in operation, to catch overspray before it enters the ductwork leading to the RTO.
- 2.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC and OC emissions are captured. Compliance with the following criteria, identified by 40 CFR Part 60, Appendix A, Method 204, shall be met by the permittee:
 - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, A.III.5, and A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information for each day peel coats are applied and not vented to the RTO:
 - a. the company identification of each peel coat employed;
 - b. documentation as to whether or not a peel coat is applied on a day when fiberglass parts are being coated;
 - c. the number of gallons of each peel coat employed;
 - d. the OC content of each peel coat, in pounds per gallon;
 - e. the total OC emission rate, in pounds per day;
 - f. the total number of hours the peel coats were being applied; and
 - g. the average hourly OC emissions rate, i.e., (e)/(f), in pounds per hour (average).
3. The permittee shall maintain records of the hours of operation of this emissions unit and the maintenance performed on the RTO.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when the emissions unit is in operation and during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, and K004:

- a. the name and identification number of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent employed;
- b. the VOC and OC contents of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent, as applied, in pounds per gallon;
- c. the number of gallons of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat and cleanup solvent employed;
- d. the number of gallons of each cleanup solvent recovered;
- e. the number of gallons of net usage of each cleanup solvent, in tons (the total of (c) minus (d));
- f. the total uncontrolled VOC and OC emission rates for all base coats/primers and clear coats, in tons (the summation of (b) times (c) for all base coats/primers and clear coats);
- g. the calculated, controlled VOC and OC emission rates for all base coats/primers and clear coats, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- h. the total uncontrolled VOC and OC emission rates for all cleanup solvents employed, in tons (the summation of (e) times (b) for all cleanup solvents);
- i. the calculated, controlled VOC and OC emission rates for all cleanup solvents, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- j. the total uncontrolled VOC and OC emission rates for all water-based peel coats and solvent-based peel coats employed, in tons (the summation of (b) times (c) for all peel coats);
- k. the total VOC and OC emissions from all base coats/primers, clear coats, water-based peel coats, solvent-based peel coats, and cleanup solvents employed, in tons (the summation of (g) plus (i) plus (j))
[Note: Base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent usages do not have to be recorded for individual emissions units. Paint mix data may be used to approximate the monthly paint usage and VOC and OC emissions for K001, K002, K003, and K004.]; and
- l. the total usages of all base coats/primers, all clear coats, all cleanup solvents (net usage), all water-based peel coats, and all solvent-based peel coats, in gallons.

NOTE: To simplify the record keeping, it is assumed the peel coats are uncontrolled throughout the year.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5 and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following limits:
 - a. the base coat/primer usage restriction of 7,759 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - b. the clear coat usage restriction of 4,667 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - c. the VOC/OC content limitation of 6.74 lbs/gallon for each base coat/primer;
 - d. the VOC/OC content limitation of 3.57 lbs/gallon for each clear coat;
 - e. the net cleanup solvent usage restriction of 185 gallons/month for emissions units K001, K002, K003, and K004 combined (net = gross minus waste disposal);
 - f. the VOC/OC content limitation of 6.60 lbs/gallon for the cleanup solvent;
 - g. the water-based maintenance peel coat usage restriction of 116.7 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - h. the VOC/OC content limitation of 0.23 lb/gallon for each water-based maintenance peel coat;
 - i. the solvent-based maintenance peel coat usage restriction of 10 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - j. the VOC/OC content limitation of 5.90 lbs/gallon for each solvent-based maintenance peel coat; and
 - k. the VOC/OC emission limitation of 1.8 tons/month for emissions units K001, K002, K003, and K004 combined.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in section A.II.2 of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the usage of peel coat exceeded 8 lbs/hr and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the usage of peel coat exceeded 40 lbs/day and the actual OC emissions for each such day; and
 - c. an identification of each day during which both peel coat was applied and base coat/primer or clear coat was applied to fiberglass parts.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
7. The permittee shall submit annual reports, by April 15 of each year, of the total VOC/OC emissions from emissions units K001, K002, K003, and K004, combined, in tons.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.V.2, A.V.3, A.V.4 and A.V.5. The testing requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

1.8 tons/month and 21.6 tons/yr of VOC from emissions units K001, K002, K003, and K004 combined

1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section A.III.5 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

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

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.c Emissions Limitation:

2.41 tons/yr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.d Emissions Limitation:

20% opacity, as a 6-minute average, from the RTO stack

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2.e Emissions Limitations:

1.84 lbs/hr of VOC emissions from emissions unit K001

1.84 lbs/hr of OC emissions from emissions unit K001

(does not include emissions from peel coat applications)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following one-time calculation (for worst-case VOC emissions) and a 95% control efficiency:

Basecoat

3.66 gal/hr x 6.74 lbs of VOC/gal = 24.67 lbs of VOC/hr

Clearcoat

2 gal/hr x 3.57 lbs of VOC/gal = 7.14 lbs of VOC/hr

Cleanup

2 flushes/hr x 2.5 lbs of VOC/flush = 5 lbs of VOC/hr

Total

24.67 + 7.14 + 5 = 36.81 lbs of VOC/hr x 0.05 = 1.84 lbs of VOC/hr

2.f Emissions Limitations:

8.06 tons/yr of VOC emissions from emissions unit K001

8.06 tons/yr of OC emissions from emissions unit K001

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2.g Emissions Limitation:

Each base coat/primer employed shall contain no more than 6.74 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.h Emissions Limitation:

Each clear coat employed shall contain no more than 3.57 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

V. Testing Requirements (continued)

2.i Emissions Limitation:

Each cleanup solvent employed shall contain no more than 6.60 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.j Emissions Limitation:

Each water-based maintenance peel coat employed shall contain no more than 0.23 lb/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.k Emissions Limitation:

Each solvent-based maintenance peel coat employed shall contain no more than 5.9 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.l Emissions Limitations:

8 lbs/hr of OC
40 lbs/day of OC

(These limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled.)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.2.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

The maximum amount of base coat/primer employed each month shall not exceed 7,759 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.b Usage Restriction:

The maximum amount of clear coat employed each month shall not exceed 4,667 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

V. Testing Requirements (continued)

3.c Usage Restriction:

The maximum amount of cleanup material employed each month (net) shall not exceed 185 gallons (net = gross minus waste disposal) for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.d Usage Restriction:

The maximum amount of water-based maintenance peel coatings employed each month shall not exceed 116.7 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.e Usage Restriction:

The maximum amount of solvent-based maintenance peel coatings employed each month shall not exceed 10 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.f Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.g Operational Limitation:

95% VOC destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.b.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
 - d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s).
5. The VOC content of each coating and cleanup material employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint/Spray Booth #3 (K003)

Activity Description: Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #3 and cure oven for coating fiberglass parts, controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and exhaust filters	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	<p>The volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>The organic compound (OC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>See section A.1.2.a below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	<p>The OC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>The VOC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>(These allowables represent the maximum production capacity of this emissions unit; therefore, no record keeping is required to demonstrate compliance.)</p> <p>The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11, and 3745-21-07(G)(2).</p> <p>See sections A.I.2.b, A.I.2.c, and A.I.2.d below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The OC emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. (These emission limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled. The OC emission limit (85% overall control efficiency) that applies when the peel coat emissions are vented to the RTO is less stringent than PTI 15-01409.)</p>
	OAC rule 3745-17-07(A)(1)	<p>See section A.I.2.e below.</p> <p>Visible particulate emissions from the RTO stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11	<p>Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.</p>

2. Additional Terms and Conditions

- 2.a** The emission limitations of 1.8 tons/month and 21.6 tons/yr of VOC and 1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004, combined, shall be achieved by restricting material usage and VOC/OC content as indicated in the following table:

Material Description	Usage Restriction (gallons/month)	VOC/OC Content (lbs/gallon)
base coat/primer	7,759	6.74
clear coat	4,667	3.57
cleanup solvent	185 (net)	6.60
maintenance peel coat (water-based)	116.7	0.23
maintenance peel coat (solvent-based)	10	5.90

- 2.b** As part of BAT, the minimum capture efficiency for the OC emissions shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight. The OC emissions from the application of a peel coat do not have to be captured.
- 2.c** This emissions unit shall be totally enclosed such that all the VOC and OC emissions, except those emissions from the peel coats when they are not being vented to the RTO, are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in 40 CFR Part 60, Appendix A, 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The peel coat may be applied during periods when the RTO is not operating.

II. Operational Restrictions

1. The permittee shall employ a dry exhaust filtration system, when this emissions unit is in operation, to catch overspray before it enters the ductwork leading to the RTO.
2. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC and OC emissions are captured. Compliance with the following criteria, identified by 40 CFR Part 60, Appendix A, Method 204, shall be met by the permittee:
 - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, A.III.5, and A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information for each day peel coats are applied and not vented to the RTO:
 - a. the company identification of each peel coat employed;
 - b. documentation as to whether or not a peel coat is applied on a day when fiberglass parts are being coated;
 - c. the number of gallons of each peel coat employed;
 - d. the OC content of each peel coat, in pounds per gallon;
 - e. the total OC emission rate, in pounds per day;
 - f. the total number of hours the peel coats were being applied; and
 - g. the average hourly OC emissions rate, i.e., (e)/(f), in pounds per hour (average).
3. The permittee shall maintain records of the hours of operation of this emissions unit and the maintenance performed on the RTO.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when the emissions unit is in operation and during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, and K004:

- a. the name and identification number of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent employed;
- b. the VOC and OC contents of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent, as applied, in pounds per gallon;
- c. the number of gallons of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat and cleanup solvent employed;
- d. the number of gallons of each cleanup solvent recovered;
- e. the number of gallons of net usage of each cleanup solvent, in tons (the total of (c) minus (d));
- f. the total uncontrolled VOC and OC emission rates for all base coats/primers and clear coats, in tons (the summation of (b) times (c) for all base coats/primers and clear coats);
- g. the calculated, controlled VOC and OC emission rates for all base coats/primers and clear coats, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- h. the total uncontrolled VOC and OC emission rates for all cleanup solvents employed, in tons (the summation of (e) times (b) for all cleanup solvents);
- i. the calculated, controlled VOC and OC emission rates for all cleanup solvents, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- j. the total uncontrolled VOC and OC emission rates for all water-based peel coats and solvent-based peel coats employed, in tons (the summation of (b) times (c) for all peel coats);
- k. the total VOC and OC emissions from all base coats/primers, clear coats, water-based peel coats, solvent-based peel coats, and cleanup solvents employed, in tons (the summation of (g) plus (i) plus (j))
[Note: Base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent usages do not have to be recorded for individual emissions units. Paint mix data may be used to approximate the monthly paint usage and VOC and OC emissions for K001, K002, K003, and K004.]; and
- l. the total usages of all base coats/primers, all clear coats, all cleanup solvents (net usage), all water-based peel coats, and all solvent-based peel coats, in gallons.

NOTE: To simplify the record keeping, it is assumed the peel coats are uncontrolled throughout the year.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5 and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following limits:
 - a. the base coat/primer usage restriction of 7,759 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - b. the clear coat usage restriction of 4,667 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - c. the VOC/OC content limitation of 6.74 lbs/gallon for each base coat/primer;
 - d. the VOC/OC content limitation of 3.57 lbs/gallon for each clear coat;
 - e. the net cleanup solvent usage restriction of 185 gallons/month for emissions units K001, K002, K003, and K004 combined (net = gross minus waste disposal);
 - f. the VOC/OC content limitation of 6.60 lbs/gallon for the cleanup solvent;
 - g. the water-based maintenance peel coat usage restriction of 116.7 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - h. the VOC/OC content limitation of 0.23 lb/gallon for each water-based maintenance peel coat;
 - i. the solvent-based maintenance peel coat usage restriction of 10 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - j. the VOC/OC content limitation of 5.90 lbs/gallon for each solvent-based maintenance peel coat; and
 - k. the VOC/OC emission limitation of 1.8 tons/month for emissions units K001, K002, K003, and K004 combined.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in section A.II.2 of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the usage of peel coat exceeded 8 lbs/hr and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the usage of peel coat exceeded 40 lbs/day and the actual OC emissions for each such day; and
 - c. an identification of each day during which both peel coat was applied and base coat/primer or clear coat was applied to fiberglass parts.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
7. The permittee shall submit annual reports, by April 15 of each year, of the total VOC/OC emissions from emissions units K001, K002, K003, and K004, combined, in tons.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.V.2, A.V.3, A.V.4 and A.V.5. The testing requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

1.8 tons/month and 21.6 tons/yr of VOC from emissions units K001, K002, K003, and K004 combined

1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section A.III.5 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

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

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.c Emissions Limitation:

2.41 tons/yr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.d Emissions Limitation:

20% opacity, as a 6-minute average, from the RTO stack

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2.e Emissions Limitations:

1.84 lbs/hr of VOC emissions from emissions unit K001

1.84 lbs/hr of OC emissions from emissions unit K001

(does not include emissions from peel coat applications)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following one-time calculation (for worst-case VOC emissions) and a 95% control efficiency:

Basecoat

3.66 gal/hr x 6.74 lbs of VOC/gal = 24.67 lbs of VOC/hr

Clearcoat

2 gal/hr x 3.57 lbs of VOC/gal = 7.14 lbs of VOC/hr

Cleanup

2 flushes/hr x 2.5 lbs of VOC/flush = 5 lbs of VOC/hr

Total

24.67 + 7.14 + 5 = 36.81 lbs of VOC/hr x 0.05 = 1.84 lbs of VOC/hr

2.f Emissions Limitations:

8.06 tons/yr of VOC emissions from emissions unit K001

8.06 tons/yr of OC emissions from emissions unit K001

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2.g Emissions Limitation:

Each base coat/primer employed shall contain no more than 6.74 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.h Emissions Limitation:

Each clear coat employed shall contain no more than 3.57 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

V. Testing Requirements (continued)

2.i Emissions Limitation:

Each cleanup solvent employed shall contain no more than 6.60 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.j Emissions Limitation:

Each water-based maintenance peel coat employed shall contain no more than 0.23 lb/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.k Emissions Limitation:

Each solvent-based maintenance peel coat employed shall contain no more than 5.9 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.l Emissions Limitations:

8 lbs/hr of OC
40 lbs/day of OC

(These limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled.)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.2.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

The maximum amount of base coat/primer employed each month shall not exceed 7,759 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.b Usage Restriction:

The maximum amount of clear coat employed each month shall not exceed 4,667 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

V. Testing Requirements (continued)

3.c Usage Restriction:

The maximum amount of cleanup material employed each month (net) shall not exceed 185 gallons (net = gross minus waste disposal) for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.d Usage Restriction:

The maximum amount of water-based maintenance peel coatings employed each month shall not exceed 116.7 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.e Usage Restriction:

The maximum amount of solvent-based maintenance peel coatings employed each month shall not exceed 10 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.f Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.g Operational Limitation:

95% VOC destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.b.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
 - d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s).
5. The VOC content of each coating and cleanup material employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint/Spray Booth #4 (K004)

Activity Description: Paint is applied and dried by heat onto fiberglass reinforced plastic truck caps, lids and accessories.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #4 and cure oven for coating fiberglass parts, controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and exhaust filters	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	<p>The volatile organic compound (VOC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>The organic compound (OC) emissions from emissions units K001, K002, K003, and K004, combined, shall not exceed 1.8 tons/month and 21.6 tons/year.</p> <p>See section A.1.2.a below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	<p>The OC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>The VOC emissions from this emissions unit shall not exceed 1.84 lbs/hr (for RTO exhaust only) and 8.06 tons/yr (for RTO exhaust and uncontrolled peel coat emissions).</p> <p>(These allowables represent the maximum production capacity of this emissions unit; therefore, no record keeping is required to demonstrate compliance.)</p> <p>The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11, and 3745-21-07(G)(2).</p> <p>See sections A.I.2.b, A.I.2.c, and A.I.2.d below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The OC emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. (These emission limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled. The OC emission limit (85% overall control efficiency) that applies when the peel coat emissions are vented to the RTO is less stringent than PTI 15-01409.)</p>
	OAC rule 3745-17-07(A)(1)	<p>See section A.I.2.e below.</p> <p>Visible particulate emissions from the RTO stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.</p>
	OAC rule 3745-17-11	<p>Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.</p>

2. Additional Terms and Conditions

2.a The emission limitations of 1.8 tons/month and 21.6 tons/yr of VOC and 1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004, combined, shall be achieved by restricting material usage and VOC/OC content as indicated in the following table:

Material Description	Usage Restriction (gallons/month)	VOC/OC Content (lbs/gallon)
base coat/primer	7,759	6.74
clear coat	4,667	3.57
cleanup solvent	185 (net)	6.60
maintenance peel coat (water-based)	116.7	0.23
maintenance peel coat (solvent-based)	10	5.90

- 2.b** As part of BAT, the minimum capture efficiency for the OC emissions shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight. The OC emissions from the application of a peel coat do not have to be captured.
- 2.c** This emissions unit shall be totally enclosed such that all the VOC and OC emissions, except those emissions from the peel coats when they are not being vented to the RTO, are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in 40 CFR Part 60, Appendix A, 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The peel coat may be applied during periods when the RTO is not operating.

II. Operational Restrictions

- 1.** The permittee shall employ a dry exhaust filtration system, when this emissions unit is in operation, to catch overspray before it enters the ductwork leading to the RTO.
- 2.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC and OC emissions are captured. Compliance with the following criteria, identified by 40 CFR Part 60, Appendix A, Method 204, shall be met by the permittee:
 - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, A.III.5, and A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information for each day peel coats are applied and not vented to the RTO:
 - a. the company identification of each peel coat employed;
 - b. documentation as to whether or not a peel coat is applied on a day when fiberglass parts are being coated;
 - c. the number of gallons of each peel coat employed;
 - d. the OC content of each peel coat, in pounds per gallon;
 - e. the total OC emission rate, in pounds per day;
 - f. the total number of hours the peel coats were being applied; and
 - g. the average hourly OC emissions rate, i.e., (e)/(f), in pounds per hour (average).
3. The permittee shall maintain records of the hours of operation of this emissions unit and the maintenance performed on the RTO.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when the emissions unit is in operation and during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, and K004:

- a. the name and identification number of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent employed;
- b. the VOC and OC contents of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent, as applied, in pounds per gallon;
- c. the number of gallons of each base coat/primer, clear coat, water-based peel coat, solvent-based peel coat and cleanup solvent employed;
- d. the number of gallons of each cleanup solvent recovered;
- e. the number of gallons of net usage of each cleanup solvent, in tons (the total of (c) minus (d));
- f. the total uncontrolled VOC and OC emission rates for all base coats/primers and clear coats, in tons (the summation of (b) times (c) for all base coats/primers and clear coats);
- g. the calculated, controlled VOC and OC emission rates for all base coats/primers and clear coats, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- h. the total uncontrolled VOC and OC emission rates for all cleanup solvents employed, in tons (the summation of (e) times (b) for all cleanup solvents);
- i. the calculated, controlled VOC and OC emission rates for all cleanup solvents, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
- j. the total uncontrolled VOC and OC emission rates for all water-based peel coats and solvent-based peel coats employed, in tons (the summation of (b) times (c) for all peel coats);
- k. the total VOC and OC emissions from all base coats/primers, clear coats, water-based peel coats, solvent-based peel coats, and cleanup solvents employed, in tons (the summation of (g) plus (i) plus (j))
[Note: Base coat/primer, clear coat, water-based peel coat, solvent-based peel coat, and cleanup solvent usages do not have to be recorded for individual emissions units. Paint mix data may be used to approximate the monthly paint usage and VOC and OC emissions for K001, K002, K003, and K004.]; and
- l. the total usages of all base coats/primers, all clear coats, all cleanup solvents (net usage), all water-based peel coats, and all solvent-based peel coats, in gallons.

NOTE: To simplify the record keeping, it is assumed the peel coats are uncontrolled throughout the year.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5 and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following limits:
 - a. the base coat/primer usage restriction of 7,759 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - b. the clear coat usage restriction of 4,667 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - c. the VOC/OC content limitation of 6.74 lbs/gallon for each base coat/primer;
 - d. the VOC/OC content limitation of 3.57 lbs/gallon for each clear coat;
 - e. the net cleanup solvent usage restriction of 185 gallons/month for emissions units K001, K002, K003, and K004 combined (net = gross minus waste disposal);
 - f. the VOC/OC content limitation of 6.60 lbs/gallon for the cleanup solvent;
 - g. the water-based maintenance peel coat usage restriction of 116.7 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - h. the VOC/OC content limitation of 0.23 lb/gallon for each water-based maintenance peel coat;
 - i. the solvent-based maintenance peel coat usage restriction of 10 gallons/month for emissions units K001, K002, K003, and K004 combined;
 - j. the VOC/OC content limitation of 5.90 lbs/gallon for each solvent-based maintenance peel coat; and
 - k. the VOC/OC emission limitation of 1.8 tons/month for emissions units K001, K002, K003, and K004 combined.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in section A.II.2 of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the usage of peel coat exceeded 8 lbs/hr and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the usage of peel coat exceeded 40 lbs/day and the actual OC emissions for each such day; and
 - c. an identification of each day during which both peel coat was applied and base coat/primer or clear coat was applied to fiberglass parts.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
7. The permittee shall submit annual reports, by April 15 of each year, of the total VOC/OC emissions from emissions units K001, K002, K003, and K004, combined, in tons.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.V.2, A.V.3, A.V.4 and A.V.5. The testing requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

1.8 tons/month and 21.6 tons/yr of VOC from emissions units K001, K002, K003, and K004 combined

1.8 tons/month and 21.6 tons/yr of OC from emissions units K001, K002, K003, and K004 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section A.III.5 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

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

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.c Emissions Limitation:

2.41 tons/yr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.d Emissions Limitation:

20% opacity, as a 6-minute average, from the RTO stack

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2.e Emissions Limitations:

1.84 lbs/hr of VOC emissions from emissions unit K001

1.84 lbs/hr of OC emissions from emissions unit K001

(does not include emissions from peel coat applications)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following one-time calculation (for worst-case VOC emissions) and a 95% control efficiency:

Basecoat

3.66 gal/hr x 6.74 lbs of VOC/gal = 24.67 lbs of VOC/hr

Clearcoat

2 gal/hr x 3.57 lbs of VOC/gal = 7.14 lbs of VOC/hr

Cleanup

2 flushes/hr x 2.5 lbs of VOC/flush = 5 lbs of VOC/hr

Total

24.67 + 7.14 + 5 = 36.81 lbs of VOC/hr x 0.05 = 1.84 lbs of VOC/hr

2.f Emissions Limitations:

8.06 tons/yr of VOC emissions from emissions unit K001

8.06 tons/yr of OC emissions from emissions unit K001

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2.g Emissions Limitation:

Each base coat/primer employed shall contain no more than 6.74 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.h Emissions Limitation:

Each clear coat employed shall contain no more than 3.57 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

V. Testing Requirements (continued)

2.i Emissions Limitation:

Each cleanup solvent employed shall contain no more than 6.60 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.j Emissions Limitation:

Each water-based maintenance peel coat employed shall contain no more than 0.23 lb/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.k Emissions Limitation:

Each solvent-based maintenance peel coat employed shall contain no more than 5.9 lbs/gallon of VOC/OC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.5.

2.l Emissions Limitations:

8 lbs/hr of OC
40 lbs/day of OC

(These limits only apply to the emissions from the use of peel coats when these emissions are uncontrolled.)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.2.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

The maximum amount of base coat/primer employed each month shall not exceed 7,759 gallons for emissions units K001, K002, K003 and K004, combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.b Usage Restriction:

The maximum amount of clear coat employed each month shall not exceed 4,667 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

V. Testing Requirements (continued)

3.c Usage Restriction:

The maximum amount of cleanup material employed each month (net) shall not exceed 185 gallons (net = gross minus waste disposal) for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.d Usage Restriction:

The maximum amount of water-based maintenance peel coatings employed each month shall not exceed 116.7 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.e Usage Restriction:

The maximum amount of solvent-based maintenance peel coatings employed each month shall not exceed 10 gallons for emissions units K001, K002, K003, and K004 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in sections A.III.5 and A.III.6.

3.f Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.g Operational Limitation:

95% VOC destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
 - b. The emissions testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.b.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
 - d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s).
5. The VOC content of each coating and cleanup material employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Exterior Gelcoat Spray-Up (P001)
Activity Description: Gelcoat is sprayed into a concave mold.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gelcoat exterior spray-up booth and flash-off area controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and a dry filtration system	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	The volatile organic compound (VOC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The styrene emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The organic compound (OC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.7 tons/month and 44.4 tons/year.
		See section A.1.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	<p>The OC emissions from this emissions unit shall not exceed 2.5 lbs/hr* and 10.95 tons/yr.</p> <p>The VOC emissions from this emissions unit shall not exceed 2.35 lbs/hr* and 10.29 tons/yr.</p> <p>The styrene emissions from this emissions unit shall not exceed 2.35 lbs/hr* and 10.29 tons/yr.</p> <p>*See section A.I.2.e below.</p> <p>The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11.</p> <p>See sections A.I.2.b, A.I.2.c, A.I.2.d and A.I.2.f below.</p>
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the RTO stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr for this emissions unit.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(D).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.g below.

2. Additional Terms and Conditions

2.a The emissions limitations of 3.06 tons/month and 36.72 tons/year of VOC, 3.06 tons/month and 36.72 tons/year of styrene, and 3.7 tons/month and 44.4 tons/year of OC from emissions units P001, P002, and P003, combined, shall be achieved by restricting material usages and styrene/VOC/OC contents as indicated in the following table:

Material Description	Usage Restriction (pounds/month)	Styrene/VOC/OC Content (weight percent)
gelcoat	148,814	38%
resin	773,253	42%
acetone	25,550	NA
catalyst	17,390	NA

2. Additional Terms and Conditions (continued)

- 2.b** As part of BAT, the minimum capture efficiency shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight.
- 2.c** This emissions unit shall be totally enclosed such that the OC/VOC emissions are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in USEPA 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 is 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The allowable hourly emission limitations for OC, VOC, and styrene represent the maximum production capacity of this emissions unit. Therefore, no hourly record keeping is required to demonstrate compliance with these limitations.
- 2.f** The permittee shall only employ acetone or other non-VOC-containing material as the cleanup solvent for this emissions unit.
- 2.g** On August 2, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. When the NESHAP is promulgated, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP.

II. Operational Restrictions

- 1.** The permittee shall employ a dry exhaust filtration system to catch overspray before it enters the ductwork leading to the RTO.
- 2.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 3.** This emissions unit shall be totally enclosed such that VOC emissions are captured. Compliance with the following criteria, identified 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 VOC emitting point unless otherwise specified by the Administrator.
 - b.** The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d.** All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e.** All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, and A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining combined monthly emissions from emissions units P001, P002, and P003:
 - a. the name and company identification of each gelcoat, catalyst, and resin employed;
 - b. the number of pounds of each gelcoat, catalyst, and resin employed;
 - c. the total number of pounds of gelcoat, catalyst, and resin employed;
 - d. the OC content, in weight percent, of each gelcoat, catalyst, and resin employed;
 - e. the total number of pounds and density of the acetone employed;
 - f. the calculated, uncontrolled OC, VOC, and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (the uncontrolled OC, VOC, and styrene emission rates from the resins/gelcoats shall be calculated using the emission factors for styrene emissions from resins/gelcoats application, which is in pounds of styrene emitted per ton of resin/gelcoat employed, as noted in Table 3 of "United Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association, and the Composites Institute, dated April 7, 1999); and
 - g. the calculated, controlled OC, VOC and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

[Note: Material usages do not have to be recorded for each individual emissions unit.]

3. The permittee shall operate and maintain a continuous temperature monitor and recorder that measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when this emissions unit is in operation and during which the average combustion temperature within the RTO is more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment when the emissions unit was in operation.
4. The permittee shall maintain records of the maintenance performed on the RTO.
 5. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5, A.IV.6, and A.IV.7. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified in section A.II.3 above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the material usage and styrene content limits specified in section A.I.2.a above.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC, styrene, and OC emissions exceeded 3.06 tons/month, 3.06 tons/month, and 3.7 tons/month, respectively, and the actual VOC, styrene, and OC emissions for each such month.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.
6. The permittee shall submit annual reports that specify the following information for emissions units P001, P002, and P003, combined, for the previous calendar year:
 - a. VOC emissions;
 - b. OC emissions;
 - c. styrene emissions;
 - d. gelcoat usage (also specify the styrene/VOC/OC weight percent content of each gelcoat used);
 - e. resin usage (also specify the styrene/VOC/OC weight percent content of each resin used);
 - f. acetone usage; and
 - g. catalyst usage.These reports shall be submitted by April 15 of each year.
7. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2, A.V.3, and A.V.4. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emissions Limitations:

3.06 tons/month of VOC emissions from emissions units P001, P002, and P003 combined

3.06 tons/month of styrene emissions from emissions units P001, P002, and P003 combined

3.7 tons/month of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitations:

36.72 tons/year of VOC emissions from emissions units P001, P002, and P003 combined

36.72 tons/year of styrene emissions from emissions units P001, P002, and P003 combined

44.4 tons/year of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 (i.e., the summation of A.III.2.d for each month of operation) and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.c Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.d Emissions Limitation:

2.41 tons/year of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.e Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

2.f Emissions Limitations:

2.50 lbs/hr of OC emissions
2.35 lbs/hr of VOC emissions
2.35 lbs/hr of styrene emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 25.

2.g Emissions Limitations:

0.91 ton/month of OC emissions
0.85 ton/month of VOC emissions
0.85 ton/month of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum monthly hours of operation (720 hours), and then dividing by 2000 lbs/ton.

2.h Emissions Limitations:

10.95 tons/year of OC emissions
10.29 tons/year of VOC emissions
10.29 tons/year of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

148,814 pounds/month of gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

V. Testing Requirements (continued)

3.b Usage Restriction:

773,253 pounds/month of resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.c Usage Restriction:

25,550 pounds/month of acetone for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.d Usage Restriction:

17,390 pounds/month of catalyst for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.e Usage Restriction:

38% of styrene, by weight, in the gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.f Usage Restriction:

42% of styrene, by weight, in the resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.g Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.h Operational Limitation:

95% destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

V. Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.1.2.a.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
 - d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

The permittee shall submit an "Intent to Test" notification to the Canton local air agency no later than 30 days prior to the proposed test date(s) or such date approved by the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s) or such other date approved by the Canton local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Spray-Up Station #1 (P002)

Activity Description: Polyester resin and chopped fiberglass are sprayed into concave mold.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
fiberglass spray-up and flash-off area controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and a dry filtration system; classroom station #1	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	The volatile organic compound (VOC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The styrene emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The organic compound (OC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.7 tons/month and 44.4 tons/year.
		See section A.1.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	The OC emissions from this emissions unit shall not exceed 4.05 lbs/hr*, 1.48 tons/month and 17.74 tons/yr. The VOC emissions from this emissions unit shall not exceed 3.30 lbs/hr*, 1.2 tons/month and 14.45 tons/yr. The styrene emissions from this emissions unit shall not exceed 3.30 lbs/hr*, 1.2 tons/month and 14.45 tons/yr. *See section A.I.2.e below. The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11. See sections A.I.2.b, A.I.2.c, A.I.2.d and A.I.2.f below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the RTO stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr for this emissions unit.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(D).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.g below.

2. Additional Terms and Conditions

- 2.a** The emission limitations of 3.06 tons/month and 36.72 tons/year of VOC, 3.06 tons/month and 36.72 tons/year of styrene, and 3.7 tons/month and 44.4 tons/year of OC from emissions units P001, P002, and P003, combined, shall be achieved by restricting material usages and styrene/VOC/OC contents as indicated in the following table:

Material Description	Usage Restriction (pounds/month)	Styrene/VOC/OC Content (weight percent)
gelcoat	148,814	38%
resin	773,253	42%
acetone	25,550	NA
catalyst	17,390	NA

- 2.b** As part of BAT, the minimum capture efficiency shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight.
- 2.c** This emissions unit shall be totally enclosed such that the OC/VOC emissions are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in USEPA 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 is 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The allowable hourly emission limitations for OC, VOC, and styrene represent the maximum production capacity of this emissions unit. Therefore, no hourly record keeping is required to demonstrate compliance with these limitations.
- 2.f** The permittee shall only employ acetone or other non-VOC-containing material as the cleanup solvent for this emissions unit.
- 2.g** On August 2, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. When the NESHAP is promulgated, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP.

II. Operational Restrictions

1. The permittee shall employ a dry exhaust filtration system to catch overspray before it enters the ductwork leading to the RTO.
2. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC emissions are captured. Compliance with the following criteria, identified 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 VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, and A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining combined monthly emissions from emissions units P001, P002, and P003:
 - a. the name and company identification of each gelcoat, catalyst, and resin employed;
 - b. the number of pounds of each gelcoat, catalyst, and resin employed;
 - c. the total number of pounds of gelcoat, catalyst, and resin employed;
 - d. the OC content, in weight percent, of each gelcoat, catalyst, and resin employed;
 - e. the total number of pounds and density of the acetone employed;
 - f. the calculated, uncontrolled OC, VOC, and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (the uncontrolled OC, VOC, and styrene emission rates from the resins/gelcoats shall be calculated using the emission factors for styrene emissions from resins/gelcoats application, which is in pounds of styrene emitted per ton of resin/gelcoat employed, as noted in Table 3 of "United Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association, and the Composites Institute, dated April 7, 1999); and
 - g. the calculated, controlled OC, VOC and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

[Note: Material usages do not have to be recorded for each individual emissions unit.]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall operate and maintain a continuous temperature monitor and recorder that measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when this emissions unit is in operation and during which the average combustion temperature within the RTO is more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment when the emissions unit was in operation.
4. The permittee shall maintain records of the maintenance performed on the RTO.
 5. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5, A.IV.6, and A.IV.7. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified in section A.II.3 above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the material usage and styrene content limits specified in section A.I.2.a above.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC, styrene, and OC emissions exceeded 3.06 tons/month, 3.06 tons/month, and 3.7 tons/month, respectively, and the actual VOC, styrene, and OC emissions for each such month.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The permittee shall submit annual reports that specify the following information for emissions units P001, P002, and P003, combined, for the previous calendar year:
 - a. VOC emissions;
 - b. OC emissions;
 - c. styrene emissions;
 - d. gelcoat usage (also specify the styrene/VOC/OC weight percent content of each gelcoat used);
 - e. resin usage (also specify the styrene/VOC/OC weight percent content of each resin used);
 - f. acetone usage; and
 - g. catalyst usage.

These reports shall be submitted by April 15 of each year.

7. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2, A.V.3, and A.V.4. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

- 3.06 tons/month of VOC emissions from emissions units P001, P002, and P003 combined
- 3.06 tons/month of styrene emissions from emissions units P001, P002, and P003 combined
- 3.7 tons/month of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitations:

- 36.72 tons/year of VOC emissions from emissions units P001, P002, and P003 combined
- 36.72 tons/year of styrene emissions from emissions units P001, P002, and P003 combined
- 44.4 tons/year of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 (i.e., the summation of A.III.2.d for each month of operation) and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

V. Testing Requirements (continued)

2.c Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.d Emissions Limitation:

2.41 tons/year of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

2.e Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

2.f Emissions Limitations:

4.05 lbs/hr of OC emissions
3.30 lbs/hr of VOC emissions
3.30 lbs/hr of styrene emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 25.

2.g Emissions Limitations:

1.48 tons/month of OC emissions
1.2 tons/month of VOC emissions
1.2 tons/month of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum monthly hours of operation (720 hours), and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.h Emissions Limitations:

17.74 tons/year of OC emissions
14.45 tons/year of VOC emissions
14.45 tons/year of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

148,814 pounds/month of gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.b Usage Restriction:

773,253 pounds/month of resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.c Usage Restriction:

25,550 pounds/month of acetone for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.d Usage Restriction:

17,390 pounds/month of catalyst for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.e Usage Restriction:

38% of styrene, by weight, in the gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

V. Testing Requirements (continued)

3.f Usage Restriction:

42% of styrene, by weight, in the resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.g Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.h Operational Limitation:

95% destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.a.
- c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
- d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

V. Testing Requirements (continued)

The permittee shall submit an "Intent to Test" notification to the Canton local air agency no later than 30 days prior to the proposed test date(s) or such date approved by the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s) or such other date approved by the Canton local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Spray-Up Station #2 (P003)

Activity Description: Polyester resin, fillers and chopped fiberglass are sprayed into concave mold.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
fiberglass spray-up and flash-off area controlled with a permanent total enclosure (PTE), a 115,000 cfm regenerative thermal oxidizer (RTO), and a dry filtration system; classroom station #2	OAC rule 3745-31-05(D) (PTI 15-01409) (Synthetic Minor)	The volatile organic compound (VOC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The styrene emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.06 tons/month and 36.72 tons/year.
		The organic compound (OC) emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.7 tons/month and 44.4 tons/year.
		See section A.1.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	The OC emissions from this emissions unit shall not exceed 4.78 lbs/hr*, 1.75 tons/month and 20.94 tons/yr. The VOC emissions from this emissions unit shall not exceed 3.93 lbs/hr*, 1.43 tons/month and 17.21 tons/yr. The styrene emissions from this emissions unit shall not exceed 3.93 lbs/hr*, 1.43 tons/month and 17.21 tons/yr. *See section A.I.2.e below.
	OAC rule 3745-17-07(A)(1)	The particulate emissions from this emissions unit shall not exceed 2.41 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11. See sections A.I.2.b, A.I.2.c, A.I.2.d and A.I.2.f below.
	OAC rule 3745-17-11	Visible particulate emissions from the RTO stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule. Particulate emissions shall not exceed 0.551 lb/hr for this emissions unit.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(D).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.g below.

2. Additional Terms and Conditions

2.a The emission limitations of 3.06 tons/month and 36.72 tons/year of VOC, 3.06 tons/month and 36.72 tons/year of styrene, and 3.7 tons/month and 44.4 tons/year of OC from emissions units P001, P002, and P003, combined, shall be achieved by restricting material usages and styrene/VOC/OC contents as indicated in the following table:

Material Description	Usage Restriction (pounds/month)	Styrene/VOC/OC Content (weight percent)
gelcoat	148,814	38%
resin	773,253	42%
acetone	25,550	NA
catalyst	17,390	NA

- 2.b** As part of BAT, the minimum capture efficiency shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight.
- 2.c** This emissions unit shall be totally enclosed such that the OC/VOC emissions are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.
- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in USEPA 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 is 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The allowable hourly emission limitations for OC, VOC, and styrene represent the maximum production capacity of this emissions unit. Therefore, no hourly record keeping is required to demonstrate compliance with these limitations.
- 2.f** The permittee shall only employ acetone or other non-VOC-containing material as the cleanup solvent for this emissions unit.
- 2.g** On August 2, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. When the NESHAP is promulgated, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP.

II. Operational Restrictions

- 1.** The permittee shall employ a dry exhaust filtration system to catch overspray before it enters the ductwork leading to the RTO.
- 2.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that VOC emissions are captured. Compliance with the following criteria, identified 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 VOC emitting point unless otherwise specified by the Administrator.
 - b. The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d. All access doors and windows whose areas are not included in section A.II.3.b and are not included in the calculation in section A.II.3.c shall be closed during routine operation of the process.
 - e. All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2, A.III.3, A.III.4, and A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining combined monthly emissions from emissions units P001, P002, and P003:
 - a. the name and company identification of each gelcoat, catalyst, and resin employed;
 - b. the number of pounds of each gelcoat, catalyst, and resin employed;
 - c. the total number of pounds of gelcoat, catalyst, and resin employed;
 - d. the OC content, in weight percent, of each gelcoat, catalyst, and resin employed;
 - e. the total number of pounds and density of the acetone employed;
 - f. the calculated, uncontrolled OC, VOC, and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (the uncontrolled OC, VOC, and styrene emission rates from the resins/gelcoats shall be calculated using the emission factors for styrene emissions from resins/gelcoats application, which is in pounds of styrene emitted per ton of resin/gelcoat employed, as noted in Table 3 of "United Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association, and the Composites Institute, dated April 7, 1999); and
 - g. the calculated, controlled OC, VOC and styrene emission rates for all the acetone, gelcoats, catalysts, and resins employed, in pounds or tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

[Note: Material usages do not have to be recorded for each individual emissions unit.]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall operate and maintain a continuous temperature monitor and recorder that measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when this emissions unit is in operation and during which the average combustion temperature within the RTO is more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment when the emissions unit was in operation.
4. The permittee shall maintain records of the maintenance performed on the RTO.
 5. The permittee shall maintain a record of whenever the dry exhaust filtration system is not employed when the emissions unit is in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2, A.IV.3, A.IV.4, A.IV.5, A.IV.6, and A.IV.7. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified in section A.II.3 above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the material usage and styrene content limits specified in section A.I.2.a above.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC, styrene, and OC emissions exceeded 3.06 tons/month, 3.06 tons/month, and 3.7 tons/month, respectively, and the actual VOC, styrene, and OC emissions for each such month.
5. The permittee shall notify the Canton local air agency in writing of any record showing that the dry exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

IV. Reporting Requirements (continued)

6. The permittee shall submit annual reports that specify the following information for emissions units P001, P002, and P003, combined, for the previous calendar year:
 - a. VOC emissions;
 - b. OC emissions;
 - c. styrene emissions;
 - d. gelcoat usage (also specify the styrene/VOC/OC weight percent content of each gelcoat used);
 - e. resin usage (also specify the styrene/VOC/OC weight percent content of each resin used);
 - f. acetone usage; and
 - g. catalyst usage.

These reports shall be submitted by April 15 of each year.

7. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2, A.V.3, and A.V.4. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

3.06 tons/month of VOC emissions from emissions units P001, P002, and P003 combined

3.06 tons/month of styrene emissions from emissions units P001, P002, and P003 combined

3.7 tons/month of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

2.b Emissions Limitations:

36.72 tons/year of VOC emissions from emissions units P001, P002, and P003 combined

36.72 tons/year of styrene emissions from emissions units P001, P002, and P003 combined

44.4 tons/year of OC emissions from emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 (i.e., the summation of A.III.2.d for each month of operation) and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).

V. Testing Requirements (continued)

2.c Emissions Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (both the dry exhaust filtration system and the thermal oxidizer)

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

2.d Emissions Limitation:

2.41 tons/year of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

2.e Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

2.f Emissions Limitations:

4.78 lbs/hr of OC emissions

3.93 lbs/hr of VOC emissions

3.93 lbs/hr of styrene emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 25.

2.g Emissions Limitations:

1.75 tons/month of OC emissions

1.43 tons/month of VOC emissions

1.43 tons/month of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum monthly hours of operation (720 hours), and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2.h Emissions Limitations:

20.94 tons/year of OC emissions
17.21 tons/year of VOC emissions
17.21 tons/year of styrene emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton.

3. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

3.a Usage Restriction:

148,814 pounds/month of gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.b Usage Restriction:

773,253 pounds/month of resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.c Usage Restriction:

25,550 pounds/month of acetone for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.d Usage Restriction:

17,390 pounds/month of catalyst for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.e Usage Restriction:

38% of styrene, by weight, in the gelcoat for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

V. Testing Requirements (continued)

3.f Usage Restriction:

42% of styrene, by weight, in the resin for emissions units P001, P002, and P003 combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.2.

3.g Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.h Operational Limitation:

95% destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.a.
- c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
- d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

V. Testing Requirements (continued)

The permittee shall submit an "Intent to Test" notification to the Canton local air agency no later than 30 days prior to the proposed test date(s) or such date approved by the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s) or such other date approved by the Canton local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sanding & Grinding Area (P006)

Activity Description: Raw reinforced fiberglass plastic caps, lids and accessories are lightly sanded and wiped with lacquer thinner in small areas and occasionally sprayed in a small area with lacquer primer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sanding & grinding area controlled by dust collectors	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	Organic compound (OC) emissions shall not exceed 10 pounds/day, 0.15 ton/month, and 1.83 tons/year.
This emissions unit includes the sanding and grinding of fiberglass, and the dust generated is vented to dust collectors. These dust collectors are vented internally. This emissions unit also includes a second operation in which a cleaning solvent is used to wipe clean the fiberglass surface and a third operation in which small areas of fiberglass are repaired and sprayed with primer.		<p>Volatile organic compound (VOC) emissions shall not exceed 10 pounds/day, 0.15 ton/month, and 1.83 tons/year.</p> <p>Particulate emissions shall not exceed 0.04 pound/hour and 0.18 ton/year.</p>
	OAC rule 3745-17-11	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and company identification of each coating and cleanup solvent employed;
 - b. the number of gallons of each coating and cleanup solvent employed;
 - c. the OC and VOC contents of each coating and cleanup solvent employed, as applied, in pounds per gallon; and
 - d. the total OC and VOC emission rates for all coatings and cleanup solvents employed, in pounds (i.e., the summation of (b) times (c) for all coatings and cleanup solvents).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added.]
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color and location of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the total OC and/or VOC emissions from all the coatings and cleanup solvents employed exceeded 10 pounds/day.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emissions Limitations:

10 lbs/day of OC emissions
10 lbs/day of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

2.b Emissions Limitations:

0.15 ton/month of OC emissions
0.15 ton/month of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 and the sum of the daily emissions. As long as compliance is maintained with the daily limit, compliance with the monthly limit will be assumed.

2.c Emissions Limitations:

1.83 tpy of OC emissions
1.83 tpy of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 and the sum of the daily emissions.

2.d Emissions Limitations:

0.04 lb/hr of particulate emissions

Applicable Compliance Method:

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

2.e Emissions Limitations:

0.18 tpy of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the allowable hourly particulate emission limitation by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Final Prep Area (Wipe Cleaning) (P009)

Activity Description: Raw reinforced fiberglass plastic caps, lids and accessories are prepared for painting by wiping the outer surface with a cleaning solvent.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
final prep area: raw reinforced plastic caps, lids, and accessories are spot repaired and prepared for painting by wiping the outer surface with a cleaning solvent	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hr, 40 lbs/day, and 7.3 tons/year.
	OAC rule 3745-21-07(G)(2)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8 lbs/hr, 40 lbs/day, and 7.3 tons/year. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each material employed;
 - b. the number of gallons of each material employed;
 - c. the OC and VOC contents of the each material employed, in pounds per gallon;
 - d. the OC and VOC emission rates for all materials employed, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC and VOC emission rates for this emissions unit, i.e., (d)/(e), in pounds per hour (average).

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC and/or VOC emission rates exceeded 8 lbs/hr, and the actual hourly OC and/or VOC emission rates for each such day; and
 - b. an identification of each day during which the OC and/or VOC emission rates exceeded 40 lbs/day, and the actual OC and/or VOC emission rates for each such day.
3. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emissions Limitations:

8 lbs/hr of OC emissions
8 lbs/hr of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

V. Testing Requirements (continued)

2.b Emissions Limitations:

40 lbs/day of OC emissions
40 lbs/day of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

2.c Emissions Limitations:

7.3 tpy of OC emissions
7.3 tpy of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 and the sum of the daily emissions.

3. The OC/VOC content of each material employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mix Room (P010)

Activity Description: Coatings are custom mixed in one gallon cans for each product.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing and paint gun cleaners in paint mix room, with a permanent total enclosure (PTE) and a 115,000 cfm regenerative thermal oxidizer (RTO) (paint gun cleaners were previously permitted as a separate emissions unit, P005)	OAC rule 3745-31-05(A)(3) (PTI 15-01409)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.19 lb/hr, 0.056 ton/month, and 0.67 ton/year.
		The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.19 lb/hr, 0.056 ton/month, and 0.67 ton/year.
	OAC rule 3745-21-07(G)(2)	See sections A.I.2.a through A.I.2.e below. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The emission limitations of 0.056 ton/month of OC and VOC and 0.67 ton/year of OC and VOC shall be achieved by restricting the following:
 - i. the amount of VOC and OC in the paint mixed to 68,952 lbs/month; and
 - ii. the number of paint gun units cleaned to 13,688 units/month.
- 2.b As part of BAT, the minimum capture efficiency shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight.
- 2.c This emissions unit shall be totally enclosed such that OC/VOC emissions are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.

2. Additional Terms and Conditions (continued)

- 2.d** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in USEPA 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.e** The allowable hourly emission limitation for OC and VOC represents the maximum production capacity of this emissions unit; therefore, no hourly record keeping is required to demonstrate compliance with this limitation.

II. Operational Restrictions

- 1.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent test that demonstrated the emissions unit was in compliance.
- 2.** This emissions unit shall be totally enclosed such that VOC and OC emissions are captured. Compliance with the following criteria, identified 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 VOC emitting point unless otherwise specified by the Administrator.
 - b.** The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d.** All access doors and windows whose areas are not included in section A.II.2.b and are not included in the calculation in section A.II.2.c shall be closed during routine operation of the process.
 - e.** All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-01409, issued on May 31, 2001: A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time when the emissions unit is in operation and during which the average combustion temperature within the RTO is more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment when the emissions unit was in operation.
3. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the company identification of each paint mixed in this emissions unit;
 - b. the number of gallons of each paint mixed in this emissions unit;
 - c. the VOC and OC contents of each paint mixed in this emissions unit;
 - d. the total pounds of VOC and OC in all the paints mixed in this emissions unit;
 - e. the total uncontrolled VOC and OC emission rates from paint mixing, in pounds (these values shall be calculated by multiplying (d) times 0.02);
 - f. the total number of paint gun units cleaned;
 - g. the total uncontrolled VOC and OC emission rates from paint gun cleaning, in pounds (these values shall be calculated by multiplying (f) times 0.06 lb VOC/OC); and
 - h. the total controlled VOC and OC emission rates from this emissions unit, in pounds (i.e., calculated by multiplying the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, times the sum of (e) plus (g)).

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified in section A.II.1;
 - b. all exceedances of the restriction of 68,952 lbs/month of VOC and 68,952 lbs/month of OC in the paint mixed;
 - c. all exceedances of the restriction of the number of paint gun units cleaned of 13,688 units per month; and
 - d. all exceedances of the VOC/OC emission limitation of .056 ton (112 pounds)/month.
3. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 15-01409, issued on May 31, 2001: A.V.2, A.V.3, A.V.4, and A.V.5. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emissions Limitations:

0.19 lb/hr of OC emissions
0.19 lb/hr of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section A.III.3 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).
 - 2.b Emissions Limitations:

0.056 ton/month of OC emissions
0.056 ton/month of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.3 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).
 - 2.c Emissions Limitations:

0.67 ton/year of OC emissions
0.67 ton/year of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.3 and the allowable overall control efficiency (minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight).
3. Compliance with the operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - 3.a Operational Limitation:

68,952 lbs/month of OC in the paint mixed
68,952 lbs/month of VOC in the paint mixed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.3.d.

V. Testing Requirements (continued)

3.b Operational Limitation:

13,688 paint gun units cleaned per month

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.3.f.

3.c Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.d Operational Limitation:

95% destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the VOC/OC capture efficiency and control efficiency requirements specified in section A.I.2.a.
- c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
- d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

V. Testing Requirements (continued)

The permittee shall submit an "Intent to Test" notification to the Canton local air agency no later than 30 days prior to the proposed test date(s) or such date approved by the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s) or such other date approved by the Canton local air agency.

5. The OC/VOC content of each coating employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mold Maintenance Booth (P011)
Activity Description: Mold cleaning and release application booth.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
mold cleaning & release application booth, controlled with a permanent total enclosure (PTE) and a 115,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 15-1386)	The organic compound (OC) emissions from this emissions unit shall not exceed 10.38 lbs/day, 0.16 ton/month and 1.89 tons/year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11 and 3745-21-07(G)(2).
	OAC rule 3745-17-07(A)(1)	See sections A.I.2.a through A.I.2.e below. Visible particulate emissions from the RTO stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a As part of BAT, the minimum capture efficiency shall be 100%, by weight, and the minimum destruction efficiency shall be 95%, by weight.
- 2.b This emissions unit shall be totally enclosed such that OC emissions are captured for discharge through the RTO. The operation of this emissions unit shall conform with the requirements for a PTE consistent with conditions demonstrated during the most recent performance test.

2. Additional Terms and Conditions (continued)

- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in USEPA 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, and reporting to ensure the ongoing integrity of the PTE.
- 2.d** The allowable daily emission limitation for OC emissions represents the maximum production capacity of this emissions unit; therefore, no daily record keeping is required to demonstrate compliance with this limitation.
- 2.e** High volume low pressure (HVLP) spray guns shall be employed for any material that is applied by the use of a spray gun.

II. Operational Restrictions

- 1.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2.** This emissions unit shall be totally enclosed such that OC emissions are captured. Compliance with the following criteria, identified 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 VOC emitting point unless otherwise specified by the Administrator.
 - b.** The total area of all NDOs shall not exceed 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 NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure. Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.013 mm Hg (0.007 inch of H₂O) corresponds to a FV of 3,600 m/hr (200 fpm).
 - d.** All access doors and windows whose areas are not included in section A.II.2.b and are not included in the calculation in section A.II.2.c shall be closed during routine operation of the process.
 - e.** All VOC emissions must be captured and vented to the RTO, except emissions from peel coats when they are applied and not vented to the RTO.

III. Monitoring and/or Record Keeping Requirements

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #15-1386, issued on September 29, 1999: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit is in operation, was more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and/or monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification number of each mold release coating, cleaner, and cleanup solvent employed;
 - b. the OC contents of each mold release coating, cleaner, and cleanup solvent, in pounds per gallon;
 - c. the number of gallons of each mold release coating, cleaner, and cleanup solvent employed;
 - d. the total uncontrolled OC emissions from all mold release coatings, cleaners, and cleanup solvents employed, in pounds or tons (these values shall be calculated as the summation of (b) times (c) for all the mold release coatings, cleaners, and cleanup solvents);
 - e. the calculated, controlled OC emission rate for all mold release coatings, cleaners, and cleanup solvents, in tons (the controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - f. the number of days of operation; and
 - g. the average, controlled OC emission rate for all the mold release coatings, cleaners, and cleanup solvents, in pounds per day, i.e. (e)/(f).
 4. The permittee shall maintain records of the maintenance performed on the RTO.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #15-1386, issued on September 29, 1999: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the OC emissions exceeded 0.16 ton/month and the actual OC emissions for each such month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average OC emissions exceeded 10.38 lbs/day, and the actual average OC emissions for each such month.
5. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #15-1386, issued on September 29, 1999: A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

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

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency = 70%, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency = 95% (thermal oxidizer)

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

2.b Emissions Limitations:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

2.c Emissions Limitations:

10.38 lbs/day of OC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

2.d Emissions Limitations:

0.16 ton/month and 1.89 tons/year of OC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping requirements specified in section A.III.3 (i.e., the summation of A.III.3.e) and the minimum capture efficiency of 100%, by weight, and the minimum destruction efficiency of 95%, by weight.

3. Compliance with the operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

3.a Operational Limitation:

100% capture efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

3.b Operational Limitation:

95% OC destruction efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.4.

4. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the OC capture efficiency and control efficiency requirements specified in section A.I.2.a.
- c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating at or near their maximum capacities, unless otherwise specified or approved by the Canton local air agency.
- d. 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 an alternative method or procedure for the determination of capture efficiency in accordance with the "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.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and the 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.

The permittee shall submit an "Intent to Test" notification to the Canton local air agency no later than 30 days prior to the proposed test date(s) or such date approved by the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency 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.

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 Canton local air agency within 30 days following completion of the test(s) or such other date approved by the Canton local air agency.

5. The OC content of each mold release coating, cleaner, and cleanup solvent employed shall be determined based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24.

Facility Name: **A.R.E., Inc.- Massillon**
Facility ID: **15-76-13-1793**
Emissions Unit: **Mold Maintenance Booth (P011)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
mold cleaning & release application booth, controlled with a permanent total enclosure (PTE) and a 115,000 cfm regenerative thermal oxidizer (RTO)		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emission unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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