



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

7/7/2011

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0285000291  
Permit Number: P0107136  
Permit Type: Renewal  
County: Wayne

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO





Response to Comments

Response to comments for: Permit-To-Install and Operate

Table with 2 columns and 7 rows containing permit details: Facility ID, Facility Name, Facility Description, Facility Address, Permit #, and public notice information.

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

The following comments were generated during the comment period by the company and their consultant concerning the draft permit P0107136, for the facility.

- 1. Topic: P004
a. Comment: Change six month period to three month period in section e)(2)b.
b. Response: Changed to three month period.
2. Topic: R004-R007 and R015
a. Comment: Change language in R004-R007, section d)(9) and R015 section d)(7), by deleting "to ensure that it is operated in accordance with the manufacturer's recommendations, the company was concerned because not all emission units necessarily have specific manufacturer's recommendations due to the age of the equipment.
b. Response: The language was changed to reflect this concern by eliminating the portion of that paragraph referenced above.



3. Topic: R004-R007 and R015
  - a. Comment: Add language in R004-R007 sections d)(11) and e)(3) and R015 sections d(9) and e)(2) because not all emission units necessarily have specific manufacturer's recommendations due to the age of the equipment.
  - b. Response: Added "if available, or" to the above referenced sections.
  - c.
4. Topic: R008-R011
  - a. Comment: Section b)(1)e does not apply since these units are not listed in the rule table for the facility.
  - b. Response: This section was removed following verification of the rule table and its content.
5. Topic: R008-R0011, R012-R014, and R016
  - a. Comment: Section b)(2)b does not apply since the rule revision does not apply.
  - b. Response Removed this paragraph from section b)(2).
  - c.
6. Topic: R008-R0011, R012-R014, and R016
  - a. Comment: Section b)(1) OAC rule 3745-17-11 does not apply since these emissions units do not meet the definitions from the rule.
  - b. Response: Following and inspection of these emissions units in question and review of the rule definitions it has been determined that the rule does not apply. Those portions of sections c), d) and e) not applicable were deleted.
7. Topic: R015
  - a. Comment: Section f)(1)e does not apply.
  - b. Response: That is correct OAC rule 3745-21-25 does not apply to this emissions unit and therefore has been deleted.



**FINAL**

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

Facility ID:	0285000291
Permit Number:	P0107136
Permit Type:	Renewal
Issued:	7/7/2011
Effective:	7/7/2011
Expiration:	7/7/2016





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

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## Authorization

Facility ID: 0285000291  
Application Number(s): A0040386  
Permit Number: P0107136  
Permit Description: Renewal PTIO for emissions units P004 and R004-R016.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 7/7/2011  
Effective Date: 7/7/2011  
Expiration Date: 7/7/2016  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

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

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

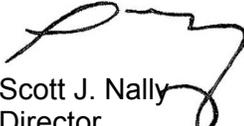
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



Authorization (continued)

Permit Number: P0107136
Permit Description: Renewal PTIO for emissions units P004 and R004-R016.

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

Emissions Unit ID: P004
Company Equipment ID: Sanding and Grinding Booth
Superseded Permit Number: 02-21484
General Permit Category and Type: Not Applicable

Emissions Unit ID: R015
Company Equipment ID: Primer Spray Booth
Superseded Permit Number: 02-21484
General Permit Category and Type: Not Applicable

Group Name: Gelcoat Booths

Table with 2 columns: Emissions Unit ID and details. Rows include R008, R009, R010, and R011 with their respective equipment IDs and permit numbers.

Group Name: Paint Booths

Table with 2 columns: Emissions Unit ID and details. Rows include R004, R005, and R006 with their respective equipment IDs and permit numbers.

<b>Emissions Unit ID:</b>	<b>R007</b>
Company Equipment ID:	Paint Booth 4
Superseded Permit Number:	02-21484
General Permit Category andType:	Not Applicable

**Group Name: Resin Booths**

<b>Emissions Unit ID:</b>	<b>R012</b>
Company Equipment ID:	Gelcoat Station
Superseded Permit Number:	02-21484
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R013</b>
Company Equipment ID:	Polyester Resin Spray-Up Booth
Superseded Permit Number:	02-21484
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R014</b>
Company Equipment ID:	Polyester Resin Spray-Up Booth
Superseded Permit Number:	02-21484
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R016</b>
Company Equipment ID:	Large Component Spray-Up Area
Superseded Permit Number:	02-21484
General Permit Category andType:	Not Applicable

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

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

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

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

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

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

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

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

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

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

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

**1. P004, Sanding and Grinding Booth**

**Operations, Property and/or Equipment Description:**

sanding and grinding booth w/ 4 bag filters

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21484 effective 07/13/06)	Particulate emissions with a diameter less than or equal to 10 microns (PM <sub>10</sub> ) shall not exceed 0.03 gr/dscf (2.93 lbs/hr) and 12.84 tons per year.  a) There shall be no visible particulate emissions from the control system exhaust.
b.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The dust collectors shall be operated with sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The pressure drop across each dust collector shall be maintained within the range of 1.5 to 4 inches of water column at all times while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to monitor pressure drop across each dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each dust collector on a weekly basis.
- (2) The permittee shall perform weekly checks for any visible particulate emissions from the exhausts of the dust collectors. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhausts from the dust collectors for this emissions unit are currently vented back into the building. This is the normal operating mode for this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any dust collector did not comply with the allowable range specified above.
- (2) The permittee shall submit quarterly written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. describe any corrective action(s) taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous three-month period.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due

date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 0.03 gr/dscf (2.93 lbs/hr).

Applicable Compliance Method:

If required, compliance with the grain loading limit shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 12.84 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable PM<sub>10</sub> emission limitation (2.93 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

There shall be no visible particulate emissions from the control system exhaust.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

g) Miscellaneous Requirements

(1) None.

**2. R015, Primer Spray Booth**

**Operations, Property and/or Equipment Description:**

primer spray booth

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21484 effective 07/13/06)	On days when coating non-metal parts or days when coating metal and non-metal parts, organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.  Compliance with the requirements of OAC rule 3745-31-05(A)(3) shall include compliance with OAC rule 3745-21-09(U) and the requirements established pursuant to OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-07(G)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)c.

c.	OAC rule 3745-21-09(U)(2)(e)(iii)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) provided that it employs no more than 10 gallons per day of coatings used to coat metal parts.
d.	OAC rule 3745-31-05(D)	See b(2)a and b)(2)b.
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

- a. The organic compound/volatile organic compound (OC/VOC) emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- b. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

\* as defined in OAC rule 3745-15-05

\*\* pursuant to OAC rule 3745-31-03

A listing of HAPs can be found in Section 112(b) of the Clean Air Act.

- c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirements to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b.

c) Operational Restrictions

- (1) The permittee shall employ no more than 10 gallons per day of coatings applied to metal parts in this emissions unit.
- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) if available; or with any modifications deemed necessary by the permittee.

- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual if available; or with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to optimum operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e.,  $b \times c$ ), in pounds;

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

- e. the total number of hours that the emissions unit was in operation; and
- f. the average hourly OC/VOC emission rate, in pounds per hour, (i.e.,  $d / e$ ).

- (2) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016, combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from d)(1)) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].

- (3) The permittee shall collect and record the following information each month for this emissions unit:

- a. the company name and identification number of each coating and cleanup material employed;
- b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
- c. the number of gallons of each coating and cleanup material employed;

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

- d. the total emissions of each individual HAP, in pounds [i.e., summation of  $(b \times c)$  for each individual HAP for all the coatings and cleanup materials;

- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from d)(3)d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e, summation of “d” for all the HAPs); and
  - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from d)(3)f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].
- (4) The permittee shall collect and record the following information each day that metal parts are coated in this emissions unit:
- a. the name and identification number of each coating applied to metal parts;
  - b. the VOC content of each coating applied to metal parts, as applied, in pounds per gallon;
  - c. the volume, in gallons, of each coating applied to metal parts; and
  - d. the total volume, in gallons, of all of the coatings applied to metal parts.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals if available for the dry particulate filter, or documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, if available, with any modifications deemed necessary by the permittee or operator. If a manufacturer's inspection frequency is available, inspections shall be performed at such intervals, and the permittee shall maintain a copy of the recommendations to be made available to the Ohio EPA, upon request. If manufacturer's recommendations are not available, the filter shall be inspected weekly, and replaced as needed.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;

- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all exceedances of the weighted average VOC hourly, daily and annual emission limitations specified in b)(1) and b)(2).
- (2) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations, if available, with any documented modifications made by the permittee when the emissions unit(s) was/were in operation.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

On days when coating non-metal parts or days when coating metal and non-metal parts, OC emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1).

- b. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitations:

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

Applicable Compliance Method:

Compliance with these annual emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(3).

d. Emission Limitation:

The permittee shall employ no more than 10 gallons per day of coatings applied to metal parts in this emissions unit.

Applicable Compliance Method:

Compliance with this operational restriction shall be demonstrated based upon the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

(1) None.

**3. Emissions Unit Group -Gelcoat Booths: R008, R009, R010, R011,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R008	gelcoat spray-up booth no. 1
R009	gelcoat spray-up booth no. 2
R010	hand lay-up of polyester resin and fiberglass mat to form plugs and molds
R011	spray-up booth no. 3

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21484 effective 07/13/06)	Compliance with the requirements in OAC rule 3745-21-07(G)(2) and the requirements established pursuant to OAC rule 3745-31-05(D) shall satisfy the requirements of OAC rule 3745-31-05(A)(3).
b.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.  See b)(2)a.
c.	OAC rule 3745-31-05(D)	See b)(2)c and b)(2)d.
d.	OAC rule 3745-21-25(G)(3)	Tables 1 and 2.  See b)(2)b and c)(1).

(2) Additional Terms and Conditions

- a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirements to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b and the reference to OAC rule 3745-21-07(G)(2) in b)(1)a.
- b. The emissions limitations and control requirements from OAC rule 3745-21-25, and the associated operational restrictions, monitoring, recordkeeping, and reporting requirements, shall become federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-25, as a revision to Ohio's State Implementation Plan (SIP). The following terms and conditions shall become void after U.S. EPA approves the rule revision: none.
- c. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.  
  
\* as defined in OAC rule 3745-15-05  
  
\*\* pursuant to OAC rule 3745-31-03  
  
A listing of HAPs may be found in Section 112(b) of the Clean Air Act.
- d. The organic compound/volatile organic compound (OC/VOC) emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The permittee shall implement the appropriate work practice standards from Table 1 and the VOC emission limits from Table 2 of OAC rule 3745-21-25.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification and number of pounds of each gelcoat and resin employed;
  - b. the OC/VOC content of each gelcoat and resin, in percent by weight;

- c. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW;
- d. the company identification for each coating and cleanup material employed;
- e. the number of gallons of each coating and cleanup material employed;
- f. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
- g. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e., e x f), in pounds;

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

- h. the total number of hours that the emissions unit was in operation;
- i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., sum of c and g); and
- j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by h).

(2) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016, combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from d)(1)) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].

(3) The permittee shall collect and record the following information each month for this emissions unit:

- a. the company name and identification number of each coating, cleanup material, gelcoat, and resin employed;
- b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon and for each gelcoat and resin employed, in weight percent;
- c. the number of gallons of each coating and cleanup material, and number of pounds of each gelcoat and resin employed;

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

- d. the total emissions of each individual HAP, in pounds [i.e., summation of (b x c) for each individual HAP for all the coatings, cleanup materials, gelcoats, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the gelcoats and resins];

- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from d)(3)d for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings, cleanup materials, gelcoats, and resins employed (i.e, summation of “d” for all the HAPs); and
  - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from d)(3)f for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].
- (4) The permittee shall collect and record the following information each month for this emissions unit:
- a. calculated weighted average VOC emissions limit for the last 12 months (using the equation presented in OAC rule 3745-21-25(G)(3)(a);
  - b. calculate the weighted average VOC emissions factor (using the equation presented in OAC rule 3745-21-25G)(3)(b); and
  - c. if each rolling, 12-month average VOC emission factor in “a” and “b” above is less than or equal to the corresponding rolling, 12-month average VOC emission limit specified in Table 2 of OAC rule 3745-21-25, then the operation is compliant.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify all exceedances of the weighted average VOC, hourly, daily and annual emission limitations specified in section b)(1) and b)(2).
  - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitations:  
OC emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitations:

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

Applicable Compliance Method:

Compliance with these annual emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(3).

d. Emission Limitation:

The permittee shall comply with all applicable emission limitations specified in Table 2 of OAC rule 3745-21-25.

Applicable Compliance Method:

Compliance with the applicable emission limitation(s) shall be demonstrated based upon the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

(1) None.

**4. Emissions Unit Group -Paint Booths: R004, R005, R006, R007,**

EU ID	Operations, Property and/or Equipment Description
R004	paint spray booth #1 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R005	paint spray booth #2 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R006	paint spray booth #3 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R007	paint spray booth #4 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21484 effective 07/13/06)	See b)(2)a through b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)e, b)(2)f and b)(2)h.
c.	OAC rule 3745-21-07(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(U)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-07(M)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-11(C)	See c)(3) and c)(4).

(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100 percent, by weight, and a minimum destruction efficiency of 95 percent, by weight.
- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- c. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE when opened]. Therefore, the permittee will not be required to perform any additional monitoring, recordkeeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- d. The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- e. The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- f. Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO, combined, shall not exceed the following:
 

particulate matter (PM <sub>10</sub> )	0.13 ton per year;
nitrogen oxides (NO <sub>x</sub> )	18.34 tons per year;

carbon monoxide (CO)      52.67 tons per year;  
sulfur dioxide (SO<sub>2</sub>)      0.01 ton per year; and  
OC/VOC                      0.09 ton per year.

- g. The emission limitations specified in b)(2)f represent the potential to emit for these units. Therefore, no monitoring or record keeping requirements are required to demonstrate compliance with these limits.
- h. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

\* as defined in OAC rule 3745-15-05

\*\* pursuant to OAC rule 3745-31-03

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

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



- e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
  - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
- (4) The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units R004 through R007, R012, R013, R014 and R016, combined.
- (5) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016, combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from d)(4)) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
- (6) The permittee shall collect and record the following information each month for emissions units R004 through R007, combined:
- a. the company name and identification number of each coating and cleanup material employed;
  - b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total controlled emissions of each individual HAP, in pounds, for all coatings and cleanup materials employed [i.e., summation of (b x c) for each individual HAP for all the coatings and cleanup materials employed x (1-overall control efficiency)];
- Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed before performing the calculation. The overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance shall be used in this calculation.
- e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d)(6)d. for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e, summation of d for all the HAPs); and



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

- (2) The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly emission limitation specified in b)(2)d and the annual emission limitations specified in b)(2)e and b)(2)h.
  - (3) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations, if available, with any documented modifications made by the permittee when the emissions unit(s) was/were in operation.
  - (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form or manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in f(2) and OAC rule 3745-21-10(C).
    - b. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(3) and d)(4).

The tpy emission limitation was developed by multiplying the short-term allowable OC/VOC emission limitation (5.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if

compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(5).

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitation:

Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO, combined, shall not exceed the following:

- PM<sub>10</sub> 0.13 ton per year;
- NO<sub>x</sub> 18.34 tons per year;
- CO 52.67 tons per year;
- SO<sub>2</sub> 0.01 ton per year; and
- OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be demonstrated using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with R004 through R007 and emission factors provided by the manufacturer for the RTO.

- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted to demonstrate compliance with the established emission limitations requirements specified approximately 2.5 years after permit issuance and within 6 months prior to the permit expiration.
  - b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
  - f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(3) The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

**5. Emissions Unit Group -Resin Booths: R012, R013, R014, R016,**

EU ID	Operations, Property and/or Equipment Description
R012	gelcoat station and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R013	polyester resin/fiberglass spray-up booth #1 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R014	polyester resin/fiberglass spray-up booth #2 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)
R016	large component spray-up area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-21484 effective 07/13/06)	See b)(2)a through b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)e and b)(2)f.
c.	OAC rule 3745-21-07(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)g.
d.	OAC rule 3745-21-25(G)(3)	Tables 1 and 2. See b)(1)h and c)(3).

e.	OAC rule 3745-21-07(M)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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(2) Additional Terms and Conditions

- a. The organic compounds/volatile organic compounds (OC/VOC) emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.
- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- c. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE when opened]. Therefore, the permittee will not be required to perform any additional monitoring, recordkeeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- d. The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- e. The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.
- f. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year as a rolling, 12-month summation for any individual HAP and 24.5 tons per year as a rolling, 12-month summation for total combined HAPs.

\* as defined in OAC rule 3745-15-05

\*\* pursuant to OAC rule 3745-31-03

A listing of HAPs may be found in Section 112(b) of the Clean Air Act.

- g. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the

U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirements to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c.

- h. The emission limitations and control requirements from OAC rule 3745-21-25, and the associated operational restrictions, monitoring, record keeping and reporting requirements shall become federally enforceable on the date the U.S. EPA approves OAC rule 3745-21-25, as a revision to Ohio's State Implementation Plan (SIP). The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)d.

c) 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 less than 1,500 degrees Fahrenheit.
- (2) This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
  - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
  - b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
  - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
  - e. the direction of air flow through all NDO's shall be into the enclosure;
  - f. all access doors and windows whose areas are not included in section c)(2)b. and are not included in the calculations in section c)(2)c. shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.
- (3) The permittee shall implement the appropriate work practice standards from Table 1 and the VOC emission limits from Table 2 of OAC rule 3745-21-25.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
- b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

(3) The permittee shall collect and record the following information each day for this emissions unit:

- a. the company identification and number of pounds of each gelcoat and resin employed;
- b. the OC/VOC content of each gelcoat and resin, in percent by weight;
- c. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW and multiplying by (1 - control efficiency);
- d. the company identification for each coating and cleanup material employed;
- e. the number of gallons of each coating and cleanup material employed;

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

- f. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
- g. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined [i.e., (e x f) x (1 - control efficiency)], in pounds;

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

- h. the total number of hours that the emissions unit was in operation;

- i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., c + g); and
  - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i / h).
- (4) The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units R004 through R007, R012, R013, R014 and R016, combined.
- (5) The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016, combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from d)(4)) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
- (6) The permittee shall collect and record the following information each month for this emissions unit:
- a. the company name and identification number of each coating, cleanup material, gelcoat and resin employed;
  - b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon and for each resin employed, in weight percent;
  - c. the number of gallons of each coating and cleanup material, and number of pounds of each gelcoat, and resin employed;  
  
Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed.
  - d. the total emissions of each individual HAP, in pounds [i.e., summation of (b x c) x (1 - control efficiency) for each individual HAP for all the coatings, cleanup materials, gelcoats, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the gelcoats and resins];  
  
Note: These calculations shall be performed using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
  - e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from d)(6)d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings, cleanup materials, gelcoats, and resins employed (i.e, summation of "d" for all the HAPs); and



a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.

Applicable Compliance Method:

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

The tpy emission limitation was developed by multiplying the short-term allowable OC/VOC emission limitation (5.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

The OC/VOC emissions from emissions units R004 through R016, combined, shall not exceed 58.40 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(5).

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitation:

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

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated by the record keeping requirements specified in d)(7).

(2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted to demonstrate compliance with the established emission limitations requirements specified approximately 2.5 years after permit issuance and within 6 months prior to the permit expiration.
- b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the

testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

- (3) The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.