



Environmental Protection Agency

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

9/1/2011

Certified Mail

Jessica Lawrence
A.R.E. Accessories, LLC
400 Nave Road SE
P.O. Box 1100
Massillon, OH 44648

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576131793
Permit Number: P0108264
Permit Type: Initial Installation
County: Stark

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Canton City Health Department. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA
Canton; Pennsylvania; West Virginia



FINAL

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

Facility ID:	1576131793
Permit Number:	P0108264
Permit Type:	Initial Installation
Issued:	9/1/2011
Effective:	9/1/2011



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

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Authorization

Facility ID: 1576131793
Facility Description: Truck cap mfg.
Application Number(s): A0041950
Permit Number: P0108264
Permit Description: Permit-to-Install a new custom molded products fiberglass spray-up area controlled with a Permanent Total Enclosure venting to a Regenerative Thermal Oxidizer.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 9/1/2011
Effective Date: 9/1/2011

This document constitutes issuance to:

A.R.E. Accessories, LLC
400 Nave Road
Massillon, OH 44648

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

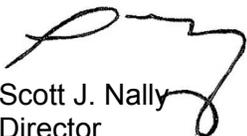
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108264

Permit Description: Permit-to-Install a new custom molded products fiberglass spray-up area controlled with a Permanent Total Enclosure venting to a Regenerative Thermal Oxidizer.

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

Emissions Unit ID:	P019
Company Equipment ID:	Custom molded products spray up.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) 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 re-issuance, or modification.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P019, Custom molded products spray up.

Operations, Property and/or Equipment Description:

Custom molded products fiberglass spray-up area controlled with a Permanent Total Enclosure (PTE) venting to a 115,000 cfm Regenerative Thermal Oxidizer (RTO) and a dry filtration system.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) 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), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions shall not exceed 0.61 lbs/hr and 2.64 tons/yr.</p> <p>Styrene emissions shall not exceed 0.56 lbs/hr and 2.44 tons/yr.</p> <p>Organic compound (OC) emissions shall not exceed 0.73 lbs/hr and 3.15 tons/yr.</p> <p>Particulate emissions with an aerodynamic diameter less than or equal to ten micrometers (PM₁₀) shall not exceed 0.628 lbs/hr and 2.75 tons/yr.</p> <p>See b(2)a., b(2)c., and b(2)d.</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b(2)b., b(2)c., and b(2)d
c.	OAC rule 3745-21-25(D)(1)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c(2).
d.	OAC rule 3745-21-25(D)(3)	The emissions limitations required by this rule are equal to or less stringent than the emissions limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(A)(3)(b) above.



e.	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.
f.	ORC 3704.03(F)(4)	Exempt. See b(2)d.
g.	OAC Rule 3745-17-11	The emissions limitations required by this rule are equal to or less stringent than the emissions limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(A)(3)(b) above.
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) In accordance with 40 CFR 63.5785 and 63.5790, this new emissions unit is located at an existing major source of HAP emissions and is engaged in open molding of reinforced plastic composites.	The organic Hazardous Air Pollutant (styrene) emissions limitation identified in Table 3 to Subpart WWWW Part 63 is equal to or less stringent than the emissions limitations established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-05(A)(3)(b) above. Work Practice Standards in Table 4 of Subpart WWWW Part 63.
i.	40 CFR Part 63, Subpart SS (40 CFR 63.980-999) In accordance with 40 CFR 63.980, these provisions apply because another Subpart (WWWW) references the use of Subpart SS for the emission unit's control device, a thermal incinerator.	Equipment and operating requirements, monitoring, recordkeeping, reporting, and testing requirements applicable to the regenerative thermal oxidizer (RTO).
j.	40 CFR Subpart A (40 CFR 63.1-15) 40 CFR 63.5925	General Provisions. Table 15 to Subpart WWWW of Part 63- Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the VOC, styrene, and OC emissions from this air contaminant source since the calculated annual emission rates for VOC, styrene, and OC are less than 10 tons/yr each taking into account the federally enforceable rule requirement of reducing the total VOC emissions by at least 95 percent by weight under OAC rule 3745-21-25(D)(3) and in accordance with the applicable rules established in 40 CFR Part 63, Subpart WWWW.

Since the styrene, OC, and VOC emissions shall be exhausted to the same control device (a regenerative thermal oxidizer), reduction of the VOC emissions results in the same reduction in styrene and OC emissions.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the PM₁₀ emissions from this air contaminant source since the calculated annual emission rate for PM₁₀ is less than 10 tons/yr taking into account the federally enforceable rule limit of 0.628 lbs/hr of particulate emissions under 3745-17-11.

- c. This emissions unit shall be totally enclosed such that all emissions are captured and discharged to a Regenerative Thermal Oxidizer (RTO). The permanent total enclosure (PTE) associated with this emissions unit shall have a capture efficiency of 100% and shall meet the criteria established for a PTE in USEPA Method 204.

The RTO shall have a minimum OC/VOC/styrene destruction efficiency of 95% by weight.

The emissions from the enclosure shall be exhausted through a replaceable filter panel to remove PM₁₀ emissions.

- d. ORC 3704.03(F)(4) and the document entitled "Review of New Sources of Air Toxics Emissions, Option A", do not apply to this air contaminant source since it is subject to a MACT control technology standard.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions pursuant to 40 CFR Part 63, Subpart WWWW (63.5780-5935) and 40 CFR Part 63, Subpart SS (40 CFR 63.980-999).
- (2) The following work practice standards from Table 1 of OAC rule 3745-21-25 apply to this emissions unit:



Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

- (3) 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 °F below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
 - (4) Resin application shall be by means of mechanical atomized spray-gun only.
 - (5) The styrene content of the resin employed shall not exceed 42% by weight.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements pursuant to 40 CFR Part 63, Subpart WWWW (63.5780-5935) and 40 CFR Part 63, Subpart SS (40 CFR 63.980-999).
 - (2) The permittee shall collect and record the following information on a daily basis for the purpose of determining hourly OC, VOC, and styrene emissions from emissions unit P019:
 - a. the name and company identification of each resin, catalyst, and cleaner employed;
 - b. the number of pounds of each resin, catalyst, and cleaner employed;
 - c. the OC, VOC, and styrene content, in weight percent, of each resin, catalyst, and cleaner employed;
 - d. the uncontrolled OC emissions attributed to the resin employed, OC_{Resin} , in lbs/day, calculated as follows:

$$OC_{Resin} = M_{resin} \times EF_{Resin} \text{ where,}$$

M_{Resin} = the tons/day of resin used, and

EF_{Resin} = 240 lbs OC/ton resin, derived from the Unified Emissions Factor for open molding for resin having a 42% maximum styrene content and applied by mechanically atomized spray (100% of the OC emissions are emitted as styrene).

- e. the uncontrolled OC emissions attributed to the "Acrastrip" cleaner employed, $OC_{\text{Acrastrip}}$, in lbs/day, calculated as follows:

$$OC_{\text{Acrastrip}} = M_{\text{resin}} \times EF_{\text{Acrastrip}} \times 2000 \text{ lb resin/ton resin} \quad \text{where,}$$

M_{Resin} = the tons/day of resin used,

$EF_{\text{Acrastrip}}$ = 0.01 lbs OC/lb resin, based on actual CY 2010 usage of "Acrastrip" for similar spray-up emissions units at the facility, and

2000 lb resin/ton resin = a conversion factor for tons of resin to lbs of resin.

- f. the uncontrolled OC emissions attributed to the acetone cleaner employed, OC_{acetone} , in lbs/day, calculated as follows:

$$OC_{\text{acetone}} = \text{lbs/day of acetone used.}$$

Note: the lbs/day of acetone collected for reuse or disposal shall be deducted from the total lbs/day of acetone used.

- g. the total uncontrolled OC emissions in lbs/day calculated as the sum of $OC_{\text{Resin}} + OC_{\text{Acrastrip}} + OC_{\text{acetone}}$ from "d", "e", and "f" above.

Note: The uncontrolled OC emissions attributed to the catalyst employed (dimethylphthalate, DMP) are negligible.

- h. the uncontrolled VOC emissions attributed to the resin employed, VOC_{Resin} , in lbs/day, which is equal to "d" above since all of the OC emissions from the resin are VOCs.

- i. the uncontrolled VOC emissions attributed to the "Acrastrip" cleaner employed, $VOC_{\text{Acrastrip}}$, in lbs/day, which is equal to "e" above since all of the OC emissions from the "Acrastrip" cleaner are VOCs.

- j. the total uncontrolled VOC emissions in lbs/day calculated as the sum of $VOC_{\text{Resin}} + VOC_{\text{Acrastrip}}$ from "h", and "i" above.

Note: The uncontrolled VOC emissions attributed to the catalyst employed (dimethylphthalate, DMP) are negligible

- k. the uncontrolled styrene emissions attributed to the resin employed, $\text{Styrene}_{\text{Resin}}$, in lbs/day, which is equal to "h" above since all of the VOC emissions from the resin are styrene.

Note: 100% of the styrene emissions are attributed to the resin employed.

- l. the number of hours the emission unit operated each day
- m. the average hourly uncontrolled OC emissions rate (i.e., g/l, in lbs/hr)
- n. the average hourly uncontrolled VOC emissions rate (i.e., j/l, in lbs/hr)
- o. the average hourly uncontrolled styrene emissions rate (i.e., k/l, in lbs/hr)
- p. the average hourly controlled emissions rates of OC, VOC, and styrene calculated by multiplying the average hourly uncontrolled emissions rate of each pollutant from m,n,o above by the $[\text{capture efficiency}/100] \times [1 - (\text{destruction efficiency}/100)]$, where:

capture efficiency = 100% for the new permanent total enclosure, and

destruction efficiency = 95% for the existing RTO.

- (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 actually measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations. Any modifications deemed necessary by the permittee shall be subject to prior approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD). 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 temperature within the RTO is more than 50 °F 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 the records necessary to demonstrate compliance with the applicable work standards and VOC emissions limits for OAC rule 3745-21-25(E) in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O), and 3745-21-25(P).

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart WWWW (63.5780-5935) and 40 CFR Part 63, Subpart SS (40 CFR 63.980-999).
- (2) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).
- (3) Quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW (63.5780-5935) and 40 CFR Part 63, Subpart SS (40 CFR 63.980-999).
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 0.61 lbs/hr and 2.64 tons/yr.

Styrene emissions shall not exceed 0.56 lbs/hr and 2.44 tons/yr.

OC emissions shall not exceed 0.73 lbs/hr and 3.15 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission rate limitations shall be demonstrated by the recordkeeping requirements in section d(2)p above.

The annual limitations were established by multiplying the hourly emission limitations by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore compliance with the hourly emissions limitations demonstrates compliance with the annual emissions limitations.

b. Emission Limitation:

0.628 lb/hr of PM₁₀ (all particulate emissions are assumed to be PM₁₀).

Applicable Compliance Method:

The worst case emission rate for particulate matter is rule based as determined by Table I of OAC Rule 3745-17-11, using a maximum Process Weight Rate (PWR) of 121.5 lbs/hr.

If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 51, Appendix M, Methods 201 or 201A,

c. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations at the RTO stack 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).

- (3) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
- a. The emissions testing shall be conducted within 180 days after start-up of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the PTE capture efficiency of 100%, RTO control efficiency of 95% by weight for emissions of OC/VOC/styrene, and to determine the RTO operating temperature.
 - c. The test(s) shall be conducted while all of the emissions units vented to the RTO are operating under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Canton City Health Department, Air Pollution Control Division (CCHD, APCD). Although this generally consists of operating the emissions units at maximum material input/production rates and results in the highest emission rates of the tested pollutants, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - 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 USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - e. 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.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or CCHD, APCD. 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 District Office's or CCHD, APCD's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or CCHD, APCD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or CCHD, APCD 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 appropriate Ohio EPA District Office or CCHD, APCD.

g) **Miscellaneous Requirements**

- (1) None.