

Facility ID: 0285000291 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0285000291 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sanding and grinding booth w/ 4 bag filters	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	0.03 gr/dscf (2.93 lbs/hr) and 12.84 tons per year of particulate emissions less than 10 microns in diameter (PM-10)
	OAC rule 3745-17-11(B)	There shall be no visible particulate emissions from the control system exhaust. 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).
	OAC rule 3745-17-07(A)	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).

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.

**B. 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.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the 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.

**D. 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 semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northeast District Office of Ohio EPA by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

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

0.03 gr/dscf (2.93 lbs/hr) and 12.84 TPY of PM-10

Applicable Compliance Method:

If required, compliance with the grain loading limit shall be determined in accordance with OAC rule 3745-17-03 (B)(10).

The annual limit was created by multiplying the equivalent hourly limit by 8,760 hrs/yr and dividing by 2,000 lbs/ton.

The tpy emission limitation was developed by multiplying the equivalent hourly allowable particulate 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.

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 determined in accordance with Method 22 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. In order to avoid the requirements of 40 CFR, Part 63, Subpart M, Subpart P, and Subpart W, and the requirements of the Title V permitting program, the permittee has voluntarily accepted the following facility-wide\* emission limitations:

24.5 TPY of total combined hazardous air pollutant (HAP) emissions, on a rolling, 12-month basis;

9.5 TPY of individual HAP emissions, on a rolling, 12-month basis;

99.5 TPY of particulate emissions less than 10 microns in diameter (PM-10); and

99.5 TPY of organic compounds/volatile organic compounds (OC/VOC).

To ensure these emission limitations are met, the permittee has agreed to accept the record keeping requirements specified below as well as the extensive record keeping requirements specified in section A.III of the terms and conditions for each individual emissions unit.

\* The facility-wide designation includes emissions units P004, R004 through R016, all de minimis units as defined in OAC rule 3745-15-05 and all units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03.

1. The following terms apply to the combination of all de minimis units (as defined in OAC rule 3745-15-05) and units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03.

Emission Limitations:

i. Emissions of OC/VOC shall not exceed 41.10 TPY, as a rolling, 12-month summation.

ii. Emissions of PM-10 shall not exceed 86.53 TPY. Currently, these units have a combined potential to emit of 63.66 TPY of PM-10.

Prior to installation of any new units that emit PM-10, the permittee shall submit a revised potential to emit analysis to demonstrate that the unit will not cause the facility to become a major source.

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

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

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

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

Record Keeping:

i. The permittee shall maintain monthly records of the rolling, 12-month summations of the monthly total OC/VOC emission rates [i.e., the rolling, 12-month summation of OC/VOC emissions shall be calculated by adding the OC/VOC emissions for the preceding 11 calendar months plus the OC/VOC emissions for the current calendar month]

ii. The permittee shall maintain monthly records of the rolling, 12-month summations of the monthly HAP emission rates for each individual HAP and total combined HAPs.

Reporting:

i. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC/VOC emission limitation.

ii. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month HAP emission limitation.

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Facility ID: 0285000291 Emissions Unit ID: R004 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #1 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e, A.2.f and A.2.h.
	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).
	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).

**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. 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. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified. 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. 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.

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 less than 0.13 ton per year;  
10 microns in diameter (PM-10)

nitrogen oxides (NOx) 18.34 tons per year;

carbon monoxide (CO) 52.67 tons per year;

sulfur dioxide (SO2) 0.01 ton per year; and

OC/VOC 0.09 ton per year.

The emission limitations specified in section A.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.

Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

#### B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

#### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units R004 through R007, combined:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC/VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total controlled OC/VOC emission rate for all coatings and cleanup materials, in pounds per day [i.e., the summation of (b x c) for each of the coatings and cleanup materials x (1-overall control efficiency)];

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

  - e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and

- f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
4. The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
  6. The permittee shall collect and record the following information each month for emissions units 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) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
    - f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e., summation of d for all the HAPs); and
    - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e., the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

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

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.h.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.  
  
Applicable Compliance Method:  
  
Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).  
Emission Limitations:  
  
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 determined by the record keeping requirements specified in sections C.3 and C.4 above.  
  
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.  
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 determined by the record keeping requirements

specified in section C.5 above.

Emission Limitations:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

Emission Limitations:

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-10 0.13 ton per year;  
 NOx 18.34 tons per year;  
 CO 52.67 tons per year;  
 SO2 0.01 ton per year; and  
 OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with emissions units 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 requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.
  - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).
  - g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material employed shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0285000291 Emissions Unit ID: R005 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #2 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e, A.2.f and A.2.h.
	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).
	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).

**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.  
 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.  
 The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.  
 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.  
 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.  
 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 less than 0.13 ton per year;  
 10 microns in diameter (PM-10)  
  
 nitrogen oxides (NOx) 18.34 tons per year;  
  
 carbon monoxide (CO) 52.67 tons per year;  
  
 sulfur dioxide (SO2) 0.01 ton per year; and  
  
 OC/VOC 0.09 ton per year.  
 The emission limitations specified in section A.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.  
 Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

**B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units R004 through R007, combined:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC/VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total controlled OC/VOC emission rate for all coatings and cleanup materials, in pounds per day [i.e., the summation of (b x c) for each of the coatings and cleanup materials x (1-overall control efficiency)];

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

  - e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
  - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
4. The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for emissions units 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) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e., summation of d for all the HAPs); and

g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e., the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

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

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.h.

**E. Testing Requirements**

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

Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

Emission Limitations:

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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitations:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

Emission Limitations:

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-10 0.13 ton per year;  
 NOx 18.34 tons per year;  
 CO 52.67 tons per year;  
 SO2 0.01 ton per year; and  
 OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with emissions units 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 requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.
  - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).
  - g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material employed shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285000291 Emissions Unit ID: R006 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #3 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.

OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e, A.2.f and A.2.h.
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).
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).

## 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.
- 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.
- The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 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.
- 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.
- 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 less than 0.13 ton per year;  
10 microns in diameter (PM-10)

nitrogen oxides (NOx) 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.

The emission limitations specified in section A.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.

Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

## B. Operational Restrictions

- 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.
- 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:
  - 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;
  - 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;
  - the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
  - the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
  - the direction of air flow through all NDO's shall be into the enclosure;
  - all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

## C. Monitoring and/or Record Keeping Requirements

- The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and

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

2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units R004 through R007, combined:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC/VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total controlled OC/VOC emission rate for all coatings and cleanup materials, in pounds per day [i.e., the summation of (b x c) for each of the coatings and cleanup materials x (1-overall control efficiency)];

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

  - e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
  - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
4. The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for emissions units 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) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e., summation of d for all the HAPs); and
  - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e., the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

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

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.h.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of

100%, by weight, and a minimum destruction efficiency of 95%, by weight.

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

Emission Limitations:

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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitations:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

Emission Limitations:

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-10 0.13 ton per year;  
 NOx 18.34 tons per year;  
 CO 52.67 tons per year;  
 SO2 0.01 ton per year; and  
 OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with emissions units 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 requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.
  - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s)

of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285000291 Emissions Unit ID: R007 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint spray booth #4 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e, A.2.f and A.2.h.
	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).
	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).

**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. 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. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified. 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.

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.

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 less than 0.13 ton per year;  
10 microns in diameter (PM-10)

nitrogen oxides (NOx) 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.

The emission limitations specified in section A.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.

Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

#### B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

#### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units R004 through R007, combined:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC/VOC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total controlled OC/VOC emission rate for all coatings and cleanup materials, in pounds per day [i.e., the summation of (b x c) for each of the coatings and cleanup materials x (1-overall control efficiency)];

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

- e. the total number of hours any OC/VOC emissions from the emissions units were vented to the RTO; and
  - f. the average hourly controlled OC/VOC emission rate [i.e., d/e, in pounds per hour (average)].
- 4. The permittee shall maintain daily records of the total combined average hourly OC/VOC emission rate for emissions units 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
- 6. The permittee shall collect and record the following information each month for emissions units 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) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - f. the total HAP emissions, in pounds, for all the coatings and cleanup materials employed (i.e., summation of d for all the HAPs); and
  - g. the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e., the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

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

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.h.

**E. Testing Requirements**

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

Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

Emission Limitations:

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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitations:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

Emission Limitations:

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-10 0.13 ton per year;  
 NOx 18.34 tons per year;  
 CO 52.67 tons per year;  
 SO2 0.01 ton per year; and  
 OC/VOC 0.09 ton per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with emissions units 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 requirement.

a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.

c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0285000291 Emissions Unit ID: R008 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gelcoat spray-up booth no. 1	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
Primer and gelcoat are sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) (PTI 02-21484)	8 lbs/hr and 40 lbs/day of organic compounds (OC) See sections A.2.a and A.2.b.

**2. Additional Terms and Conditions**

- (a) Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.  
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. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping 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 section C.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:
- the company name and identification number of each coating, cleanup material, gelcoat, and resin employed;
  - 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;
  - 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.
- 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];
  - the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - 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
  - the rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e., the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly, daily and annual emission limitations specified in section A.1 and the annual emission limitations specified in sections A.2.a and A.2.b.

**E. Testing Requirements**

- Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8 lbs/hr and 40 lbs/day of OC  
  
Applicable Compliance Method:  
  
Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.  
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 determined by the record keeping requirements specified in section C.2 above.  
Emission Limitations:  
  
Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.3 above.

**F. Miscellaneous Requirements**

- None

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Facility ID: 0285000291 Emissions Unit ID: R009 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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).

- 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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gelcoat spray-up booth no. 2	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
Primer and gelcoat are sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) (PTI 02-21484)	8 lbs/hr and 40 lbs/day of organic compounds (OC) See sections A.2.a and A.2.b.

**2. Additional Terms and Conditions**

- (a) Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.  
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. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping 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 section C.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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly, daily and annual emission limitations specified in section A.1 and the annual emission limitations specified in sections A.2.a and A.2.b.

**E. Testing Requirements**

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

Emission Limitation:

8 lbs/hr and 40 lbs/day of OC

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.

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 determined by the record keeping requirements specified in section C.2 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.3 above.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0285000291 Emissions Unit ID: R010 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hand lay-up of polyester resin and fiberglass mat to form plugs and molds	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC)
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.a and A.2.b.

2. **Additional Terms and Conditions**

- (a) Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.  
 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. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping 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 resin employed;
  - b. the OC/VOC content of each resin, in percent by weight;
  - c. the amount of OC/VOC emitted for each resin and for all 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, 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 section C.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, 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 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, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the 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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
- f. the total HAP emissions, in pounds, for all the coatings, cleanup materials, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly, daily and annual emission limitations specified in section A.1 and the annual emission limitations specified in sections A.2.a and A.2.b.

**E. Testing Requirements**

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

Emission Limitation:

8 lbs/hr and 40 lbs/day of OC

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.

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 determined by the record keeping requirements specified in section C.2 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.3 above.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 0285000291 Emissions Unit ID: R011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Applicable Emissions Limitations/Control**

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
spray-up booth no. 3	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
Application of resin and primer coatings occurs in this booth.	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C) (PTI 02-21484)	8 lbs/hr and 40 lbs/day of organic compounds (OC) See sections A.2.a and A.2.b.
<b>2. Additional Terms and Conditions</b>		
(a)	Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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. 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.	
<b>B. Operational Restrictions</b>		
1.	None	
<b>C. Monitoring and/or Record Keeping Requirements</b>		
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 resin employed;	
	b. the OC/VOC content of each resin, in percent by weight;	
	c. the amount of OC/VOC emitted for each resin and for all 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, 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 section C.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, 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 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, and resins employed, using the emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW for the 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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];	
	f. the total HAP emissions, in pounds, for all the coatings, cleanup materials, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly, daily and annual emission limitations specified in section A.1 and the annual emission limitations specified in sections A.2.a and A.2.b.

**E. Testing Requirements**

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

8 lbs/hr and 40 lbs/day of OC

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.

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 determined by the record keeping requirements specified in section C.2 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.3 above.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0285000291 Emissions Unit ID: R012 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gelcoat station and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See sections A.2.e and A.2.f.

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).

**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.
- 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.
- The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 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.
- 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.
- Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

**B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

**C. Monitoring and/or Record Keeping 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.,  $(e \times f) \times (1 - \text{control efficiency})$ ], 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., sum of c and g); and

j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].

6. The permittee shall collect and record the following information each month for 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  $(b \times c) \times (1 - \text{control efficiency})$  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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in section B.1. above.

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.f.

#### E. Testing Requirements

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

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

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

## 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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

## 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 determined by the record keeping requirements specified in section C.5 above.

## Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.
  - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).
  - g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material employed shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0285000291 Emissions Unit ID: R013 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polyester resin/fiberglass spray-up booth #1 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e and A.2.f.
	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).

**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.
 

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.

The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.

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.

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.

Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

**B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
- g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

**C. Monitoring and/or Record Keeping 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., sum of c and g); and
  - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for 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) 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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in section B.1. above.

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.f.

**E. Testing Requirements**

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

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

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.

a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.

c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M,

or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285000291 Emissions Unit ID: R014 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polyester resin/fiberglass spray-up booth #2 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.e and A.2.f.
	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).

**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.

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.

The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.

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.

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.

Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

#### B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

#### C. Monitoring and/or Record Keeping 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.,  $(e \times f) \times (1 - \text{control efficiency})$ ], 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., sum of c and g); and

j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for 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  $(b \times c) \times (1 - \text{control efficiency})$  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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any three-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in section B.1 above.  
  
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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.f.

#### E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100%, by weight, and a minimum destruction efficiency of 95%, by weight.  
  
Applicable Compliance Method:  
  
Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).  
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 determined by the record keeping requirements

specified in sections C.3 and C.4 above.

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.  
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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6 months prior to expiration of this permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.
  - c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).
  - g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material employed shall be based upon the use of Method 24 in 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285000291 Emissions Unit ID: R015 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
primer spray booth	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	On days when coating non-metal parts or days when coating metal and non-metal parts: 8 lbs/hr and 40 lbs/day of organic compounds (OC)  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U) and 3745-31-05(C).
	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).
	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.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See sections A.2.a and A.2.b.

**2. Additional Terms and Conditions**

- (a) 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. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

**B. Operational Restrictions**

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

**C. Monitoring and/or Record Keeping 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 x 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 divided by 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 section C.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:
- the company name and identification number of each coating and cleanup material employed;
  - the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
  - 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.
- the total emissions of each individual HAP, in pounds [i.e., summation of (b x c) for each individual HAP for all the coatings and cleanup materials];
  - the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];
  - 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 rolling, 12-month summation of the total monthly HAP emissions, in tons [i.e, the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].
4. The permittee shall collect and record the following information each day that metal parts are coated in this emissions unit:
- the name and identification number of each coating applied to metal parts;
  - the VOC content of each coating applied to metal parts, as applied, in pounds per gallon;
  - the volume, in gallons, of each coating applied to metal parts; and
  - the total volume, in gallons, of all of the coatings applied to metal parts.

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly and daily emission limitations specified in section A.1 and the annual emission limitations specified in sections A.2.a and A.2.b.
- The permittee shall notify the Ohio EPA, Northeast District Office of any daily record showing that the coating booth employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the Ohio EPA, Northeast District Office within 45 days after the exceedance occurs.

**E. Testing Requirements**

- Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
8 lbs/hr and 40 lbs/day of OC  
Applicable Compliance Method:  
Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.  
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 determined by the record keeping requirements specified in section C.2 above.  
Emission Limitation:  
Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.3 above.  
Operational Restriction:  
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 determined by the record keeping requirements specified in section C.4 above.

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

**F. Miscellaneous Requirements**

- 1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285000291 Emissions Unit ID: R016 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
large component spray-up area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-21484)	See sections A.2.a through A.2.d.
	OAC rule 3745-31-05(C) (PTI 02-21484)	See section A.2.e and A.2.f.
	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).

**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. 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. The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified. 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. 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. Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016, combined, 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.

**B. 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 (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
  - g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

**C. Monitoring and/or Record Keeping 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., sum of c and g); and
  - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by 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 section C.3) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for 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) 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 section d) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month];

f. the total HAP emissions, in pounds, for all the coatings, 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 section f) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature restriction specified in section B.1 above.

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 section A.2.d and the annual emission limitations specified in sections A.2.e and A.2.f.

#### E. Testing Requirements

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

Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with section E.2 below and OAC rule 3745-21-10(C).

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 determined by the record keeping requirements specified in sections C.3 and C.4 above.

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.

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 determined by the record keeping requirements specified in section C.5 above.

Emission Limitation:

Emissions of HAPs from emissions units R004 through R016, combined, 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 determined by the record keeping requirements specified in section C.6 above.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
  - a. The emissions testing shall be conducted within 2.5 years after issuance of this permit and again within 6

months prior to expiration of this permit.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.2.a.

c. If any parameter of the design or operation of the PTE is modified (see section A.2.c above), the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. Written approval from USEPA must be obtained prior to 30 days before the scheduled test date if an alternative method is to be used. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

g. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

**F. Miscellaneous Requirements**

1. None