



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
WAYNE COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-21484**

**Fac ID: 0285000291**

**DATE: 3/28/2006**

A R E Inc  
John Grindstaff  
PO Box 343 17494 Dover Rd  
Mt Eaton, OH 44659

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

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

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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NEDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 3/28/2006  
Effective Date: 3/28/2006**

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**FINAL PERMIT TO INSTALL 02-21484**

Application Number: 02-21484  
Facility ID: 0285000291  
Permit Fee: **\$2800**  
Name of Facility: A R E Inc  
Person to Contact: John Grindstaff  
Address: PO Box 343 17494 Dover Rd  
Mt Eaton, OH 44659

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**17494 Dover Rd  
Mt Eaton, Ohio**

Description of proposed emissions unit(s):  
**Synthetic minor for all emissions units.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 2. Scheduled Maintenance/Malfunction Reporting

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

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

## 3. Risk Management Plans

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

**4. Title IV Provisions**

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

**5. Severability Clause**

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

**6. General Requirements**

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

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kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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## **7. Fees**

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

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or

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required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

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**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**12. Air Pollution Nuisance**

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

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

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

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#### **4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **6. Public Disclosure**

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

#### **7. Applicability**

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

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**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install.

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P T I A

Issued: 3/28/2006

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The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM-10	99.5
OC/VOC	99.5
CO	52.67
NOx	18.34
SO2	0.01

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**A R E****PTI A****Issued: 3/28/2006**

Emissions Unit ID: P004

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

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 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 specified in section A.3 below as well as the extensive record keeping specified in section A.III. of the terms and conditions for each individual emissions unit contained in this permit.

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.

2. Emission Limitations:
  - a. Emissions of OC/VOC shall not exceed 41.10 TPY, as a rolling, 12-month summation.
  - b. 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.
  - c. Emissions of HAPs from emissions units R004 through R016 and all de minimis

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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.

3. Record Keeping:

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

4. Reporting:

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

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
P004 - sanding and grinding booth w/ 4 bag filters	OAC rule 3745-31-05(A)(3)	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)
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	OAC rule 3745-17-11(B)	There shall be no visible emissions from the control system exhaust.
	OAC rule 3745-17-07(A)	The emission limitation established in this rule is less stringent than the one established pursuant to OAC rule 3745-31-05(A)(3).  The visible emission limitation established in this rule is less stringent than the one established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.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.

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Emissions Unit ID: P004

**II. 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.

### III. Monitoring and/or Recordkeeping 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 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

### IV. 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 which (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 six-month period.

### V. Testing Requirements

1. Compliance with the emission limitations specified in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
0.03 gr/dscf (2.93 lbs/hr) and 12.84 TPY of PM-10

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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.

1.b Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

**VI. Miscellaneous Requirements**

none

**A R E****PTI A****Issued: 3/28/2006**

Emissions Unit ID: P004

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
P004 - sanding and grinding booth w/ 4 bag filters	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

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**A R E**

**PTI A**

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**V. Testing Requirements**

none

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**PTI A**

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Emissions Unit ID: P004

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
R004 - 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)  OAC rule 3745-31-05(C)  OAC rule 3745-21-07(G)	See sections A.I.2.a through A.I.2.d.  See sections A.I.2.e, A.I.2.f, and A.I.2.h.  The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	OAC rule 3745-21-09(U)	The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.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.
- 2.b The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- 2.c The PTE associated with this emissions unit demonstrated that it meets the

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

- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:
- |  |                     |
|--|---------------------|
| particulate matter less than<br>10 microns in diameter (PM-10) | 0.13 tons per year  |
| nitrogen oxides (NO <sub>x</sub> )                             | 18.34 tons per year |
| carbon monoxide (CO)   | 52.67 tons per year |
| sulfur dioxide (SO <sub>2</sub> )                              | 0.01 tons per year  |
| OC/VOC   | 0.09 tons per year  |
- 2.g** The emission limitations specified in section A.I.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.
- 2.h** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain

a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

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

contained for discharge to the RTO.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units 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)].

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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 A.III.I) 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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record

Emissions Unit ID: R004

keeping specified in section A.III.6. above.

- 1.e Emission Limitation:  
Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:

PM-10	0.13 tons per year
NOx	18.34 tons per year
CO	52.67 tons per year
SO2	0.01 tons per year
OC/VOC	0.09 tons per year

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with 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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.1.2.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.

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.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## VI. Miscellaneous Requirements

none

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R004 - paint spray booth #1 and oven with permanent total enclosure and 50,000 cfm RTO  The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	none	none

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

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**A R E**

**PTI A**

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Emissions Unit ID: R004

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

A R E

PTI A

Issued: 3/28/2006

Emissions Unit ID: R005

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R005 - 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) OAC rule 3745-31-05(C)	See sections A.I.2.a through A.I.2.d.
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	OAC rule 3745-21-07(G)  OAC rule 3745-21-09(U)	See sections A.I.2.e, A.I.2.f, and A.I.2.h.  The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified in this rule is less stringent than the

limit established pursuant  
to OAC rule  
3745-31-05(A)(3).

## **2. Additional Terms and Conditions**

- 2.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.
- 2.b** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:

Emissions Unit ID: R005

particulate matter less than 10 microns in diameter (PM-10)	0.13 tons per year
nitrogen oxides (NOx)	18.34 tons per year
carbon monoxide (CO)	52.67 tons per year
sulfur dioxide (SO <sub>2</sub> )	0.01 tons per year
OC/VOC	0.09 tons per year

- 2.g** The emission limitations specified in section A.I.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.
- 2.h** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## **II. Operational Restrictions**

1. The average combustion temperature within the RTO, for any three-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
  - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
  - b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all the NDO's shall be at least

3,600 m/hr (200 fpm);

- d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water column;
- e. the direction of air flow through all NDO's shall be into the enclosure;
- f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
- g. all OC/VOC emissions from the above-referenced units must be captured and contained for discharge to the RTO.

### **III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
- 2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
- 3. The permittee shall collect and record the following information each day for emissions units 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 A.III.I) 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

Emissions Unit ID: R005

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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record

**A R E Inc****PTI Application: 02-21184****Issue****Facility ID: 0285000291**

Emissions Unit ID: R005

keeping specified in section A.III.6. above.

1.e Emission Limitation:

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

PM-10	0.13 tons per year
NOx	18.34 tons per year
CO	52.67 tons per year
SO2	0.01 tons per year
OC/VOC	0.09 tons per year

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with 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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.1.2.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.

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.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## **VI. Miscellaneous Requirements**

none

**A R E Inc**  
**PTI Application: 02-24184**  
**Issue:**

**Facility ID: 0285000291**

Emissions Unit ID: R005

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R005 - paint spray booth #2 and oven with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

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Emissions Unit ID: R005

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
R006 - 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) OAC rule 3745-31-05(C)  OAC rule 3745-21-07(G)	See sections A.I.2.a through A.I.2.d.
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	OAC rule 3745-21-09(U)	See sections A.I.2.e, A.I.2.f, and A.I.2.h.  The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified in this rule is less stringent than the

limit established pursuant  
to OAC rule  
3745-31-05(A)(3).

## **2. Additional Terms and Conditions**

- 2.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.
- 2.b** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:

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particulate matter less than 10 microns in diameter (PM-10)	0.13 tons per year
nitrogen oxides (NOx)	18.34 tons per year
carbon monoxide (CO)	52.67 tons per year
sulfur dioxide (SO <sub>2</sub> )	0.01 tons per year
OC/VOC	0.09 tons per year

- 2.g** The emission limitations specified in section A.I.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.
- 2.h** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## **II. Operational Restrictions**

1. The average combustion temperature within the RTO, for any three-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC/VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
  - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC/VOC emitting point unless otherwise specified by the director;
  - b. the total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling;

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

### **III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
- 2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
- 3. The permittee shall collect and record the following information each day for emissions units 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;

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- 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 A.III.I) 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].

#### IV. Reporting Requirements

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

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

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

#### V. Testing Requirements

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

Emissions Unit ID: R006

- 1.a Emission Limitation:  
The OC/VOC emitted from this emissions unit shall be vented to a RTO with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight.
- Applicable Compliance Method:  
Compliance shall be determined by stack testing in accordance with section A.V.2. below and OAC rule 3745-21-10(C).
- 1.b Emission Limitation:  
The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.
- The annual emission limitation was created by multiplying the hourly emission limitation by 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly emission limitation is shown, compliance with the annual emission limitation will be assumed.
- 1.c Emission Limitation:  
The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.
- 1.d Emission Limitation:  
Emissions of HAPs from emissions units R004 through R016 and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any single HAP and 24.5 tons per year, as a rolling, 12-month summation for all HAPs combined.
- Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.6. above.
- 1.e Emission Limitation:  
Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:

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PM-10	0.13 tons per year
NOx	18.34 tons per year
CO	52.67 tons per year
SO2	0.01 tons per year
OC/VOC	0.09 tons per year

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with 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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.1.2.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.

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.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## **VI. Miscellaneous Requirements**

none

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Emissions Unit ID: R006

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R006 - paint spray booth #3 and oven with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

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**IV. Reporting Requirements**

none

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Emissions Unit ID: R006

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

A R E

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Emissions Unit ID: R007

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R007 - 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)  OAC rule 3745-31-05(C)  OAC rule 3745-21-07(G)	See sections A.I.2.a through A.I.2.d.  See sections A.I.2.e, A.I.2.f, and A.I.2.h.  The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	OAC rule 3745-21-09(U)	The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.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.
- 2.b The permanent total enclosure (PTE) serving this emissions unit shall be

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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.

- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:
- |  |                     |
|--|---------------------|
| particulate matter less than<br>10 microns in diameter (PM-10) | 0.13 tons per year  |
| nitrogen oxides (NO <sub>x</sub> )                             | 18.34 tons per year |
| carbon monoxide (CO)   | 52.67 tons per year |
| sulfur dioxide (SO <sub>2</sub> )                              | 0.01 tons per year  |
| OC/VOC   | 0.09 tons per year  |
- 2.g** The emission limitations specified in section A.I.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.
- 2.h** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain

a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

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

contained for discharge to the RTO.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for emissions units 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)].

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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 A.III.I) 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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record

keeping specified in section A.III.6. above.

- 1.e Emission Limitation:  
Emissions from natural gas combustion from the ovens associated with emissions units R004 through R007 and from the RTO combined shall not exceed the following:

PM-10	0.13 tons per year
NOx	18.34 tons per year
CO	52.67 tons per year
SO2	0.01 tons per year
OC/VOC	0.09 tons per year

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using emission factors from AP-42 "Compilation of Air Pollutant Emission Factors," section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2 for the ovens associated with 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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.1.2.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.

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.

Emissions Unit ID: R007

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## **VI. Miscellaneous Requirements**

none

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Emissions Unit ID: R007

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R007 - paint spray booth #4 and oven with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996 and PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

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**Facility ID: 0285000291**

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#### **IV. Reporting Requirements**

none

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**Issued: 3/28/2006**

Emissions Unit ID: R007

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

A R E

PTI A

Issued: 3/28/2006

Emissions Unit ID: R008

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R008 - gelcoat spray-up booth no. 1	OAC rule 3745-31-05(A)(3)	Compliance with the requirements in OAC rule 3745-21-07(G)(2) and the requirements established pursuant to OAC rule 3745-31-05(C) shall satisfy the requirements of OAC rule 3745-31-05(A)(3).
Primer and gelcoat are sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC)
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.	OAC rule 3745-31-05(C)	See sections A.I.2.a and A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

- 2.b** 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.

## II. Operational Restrictions

none

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification and number of pounds of each gelcoat and resin employed;
  - b. the OC/VOC content of each gelcoat and resin, in percent by weight;
  - c. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR, Part 63, Subpart WWWW;
  - d. the company identification for each coating and cleanup material employed;
  - e. the number of gallons of each coating and cleanup material employed;
  - f. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
  - g. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e., e x f), in pounds;

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

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

- i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., sum of c and g); and
  - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by h).
2. The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016 combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from section A.III.I) 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,

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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].

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

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

- 1.a 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 specified in section A.III.1. of these terms and conditions.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.2. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.3. above.

#### **VI. Miscellaneous Requirements**

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none

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Emissions Unit ID: R008

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R008 - gelcoat spray-up booth no. 1	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

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none

**VI. Miscellaneous Requirements**

none

A R E

PTI A

Issued: 3/28/2006

Emissions Unit ID: R009

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R009 - gelcoat spray-up booth no. 2	OAC rule 3745-31-05(A)(3)	Compliance with the requirements in OAC rule 3745-21-07(G)(2) and the requirements established pursuant to OAC rule 3745-31-05(C) shall satisfy the requirements of OAC rule 3745-31-05(A)(3).
Primer and gelcoat are sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC)
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.	OAC rule 3745-31-05(C)	See sections A.I.2.a A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

- 2.b** 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.

## II. Operational Restrictions

none

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification and number of pounds of each gelcoat and resin employed;
  - b. the OC/VOC content of each gelcoat and resin, in percent by weight;
  - c. the amount of OC/VOC emitted for each gelcoat and resin and for all gelcoats and resins combined, in pounds, calculated using the emission factors from Table 1 of 40 CFR, Part 63, Subpart WWWW;
  - d. the company identification for each coating and cleanup material employed;
  - e. the number of gallons of each coating and cleanup material employed;
  - f. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
  - g. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e., e x f), in pounds;

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

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

- i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., sum of c and g); and
  - j. the average hourly OC/VOC emission rate, in pounds per hour, (i.e., i divided by h).
2. The permittee shall maintain monthly records of the rolling, 12-month summation of the total monthly OC/VOC emissions for R004 through R016 combined, in tons [i.e, the rolling, 12-month summation of the total OC/VOC emissions shall be calculated by adding the total OC/VOC emissions (from section A.III.I) 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,

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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].

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

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

- 1.a 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 specified in section A.III.1. of these terms and conditions.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.2. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.3. above.

#### **VI. Miscellaneous Requirements**

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**PTI A**

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none

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**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R009 - gelcoat spray-up booth no. 2	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

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none

**VI. Miscellaneous Requirements**

none

A R E

PTI A

Issued: 3/28/2006

Emissions Unit ID: R010

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R010 - hand lay-up of polyester resin and fiberglass mat to form plugs and molds	OAC rule 3745-31-05(A)(3)	Compliance with the requirements in OAC rule 3745-21-07(G)(2) and the requirements established pursuant to OAC rule 3745-31-05(C) shall satisfy the requirements of OAC rule 3745-31-05(A)(3).
Application of primer coatings also occurs in this area.	OAC rule 3745-21-07(G)(2)	8 lbs/hr and 40 lbs/day of organic compounds (OC)
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.	OAC rule 3745-31-05(C)	See sections A.I.2.a and A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

- 2.b** 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.

## II. Operational Restrictions

none

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification and number of pounds of each 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 A.III.I) 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

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- 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].

#### **IV. Reporting Requirements**

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

## **V. Testing Requirements**

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

- 1.a 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 specified in section A.III.1. of these terms and conditions.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.2. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.3. above.

## **VI. Miscellaneous Requirements**

none

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R010 - hand lay-up of polyester resin and fiberglass mat to form plugs and molds	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

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**V. Testing Requirements**

none

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**A R E**

**PTI A**

**Issued: 3/28/2006**

Emissions Unit ID: R011

**VI. Miscellaneous Requirements**

none

A R E

PTI A

Issued: 3/28/2006

Emissions Unit ID: R011

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R011 - spray-up booth no. 3	OAC rule 3745-31-05(A)(3)	Compliance with the requirements in OAC rule 3745-21-07(G)(2) and the requirements established pursuant to OAC rule 3745-31-05(C) shall satisfy the requirements of OAC rule 3745-31-05(A)(3).
Application of resin and primer coatings occurs in this booth.		
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(C)	8 lbs/hr and 40 lbs/day of organic compounds (OC) See sections A.I.2.a and A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

- 2.b** 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.

## **II. Operational Restrictions**

none

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification and number of pounds of each 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 A.III.I) 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].

#### **IV. Reporting Requirements**

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**Issue**

**Facility ID: 0285000291**

Emissions Unit ID: R011

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

**V. Testing Requirements**

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

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- 1.a 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 specified in section A.III.1. of these terms and conditions.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.2. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.3. above.

## **VI. Miscellaneous Requirements**

none

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**Issued: 3/28/2006**

Emissions Unit ID: R011

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R011 - spray-up booth no. 3	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-9316 issued on February 28, 1996.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

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**A R E Inc**

**PTI Application: 02 21184**

**Issue**

**Facility ID: 0285000291**

Emissions Unit ID: R011

none

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
<p>R012 - gelcoat station and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)</p>	<p>OAC rule 3745-31-05(A)(3)                      OAC rule 3745-31-05(C)                       OAC rule 3745-21-07(G)</p>	<p>See sections A.I.2.a through A.I.2.d.</p>
<p>The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.</p>		<p>See sections A.I.2.e and A.I.2.f.                       The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).</p>

**2. Additional Terms and Conditions**

- 2.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.

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

## II. Operational Restrictions

**Issued: 3/28/2006**

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature

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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).

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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 A.III.I) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
6. The permittee shall collect and record the following information each month for this emissions unit:

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

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

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

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

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

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- 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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

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

Applicable Compliance Method:

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

- 1.b Emission Limitation:

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

1.c Emission Limitation:

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

1.d Emission Limitation:

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.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 by March 26, 2006, coinciding with the date in the Title V permit.
- b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.I.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

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may be used with prior approval from the Ohio EPA.

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.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## **VI. Miscellaneous Requirements**

none

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.	none	none

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

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**A R E Inc**

**PTI Application: 02 24184**

**Issue**

**Facility ID: 0285000291**

Emissions Unit ID: R012

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
R013 - 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) OAC rule 3745-31-05(C) OAC rule 3745-21-07(G)	See sections A.I.2.a through A.I.2.d. See sections A.I.2.e and A.I.2.f. The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions**

- 2.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.
- 2.b The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in

Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any three-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and

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- 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 A.III.I) 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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

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

Applicable Compliance Method:

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

- 1.b Emission Limitation:

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

the hourly emission limitation is shown, compliance with the annual emission limitation will be assumed.

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

Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

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

Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.I.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.

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Emissions Unit ID: R013

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.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## **VI. Miscellaneous Requirements**

none

**A R E****PTI A****Issued: 3/28/2006**

Emissions Unit ID: R013

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R013 - polyester resin/fiberglass spray-up booth #1 and flash-off area with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions****2.a** none**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

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**Issue**

**Facility ID: 0285000291**

Emissions Unit ID: R013

**IV. Reporting Requirements**

none

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**PTI A**

**Issued: 3/28/2006**

Emissions Unit ID: R013

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
<p>R014 - polyester resin/fiberglass spray-up booth #2 and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)</p> <p>The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.</p>	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-31-05(C)</p> <p>OAC rule 3745-21-07(G)</p>	<p>See sections A.I.2.a through A.I.2.d.</p> <p>See sections A.I.2.e and A.I.2.f.</p> <p>The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).</p>

**2. Additional Terms and Conditions**

- 2.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.
- 2.b The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in

Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any three-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for this emissions unit:

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

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

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

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

- h. the total number of hours that the emissions unit was in operation;
  - i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., 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 A.III.I) 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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

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

Applicable Compliance Method:

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

- 1.b Emission Limitation:

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

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.

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

- 1.c Emission Limitation:

The OC/VOC emissions from emissions units R004 through R016 combined, shall not

exceed 58.40 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.

1.d Emission Limitation:

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.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 by March 26, 2006, coinciding with the date in the Title V permit.
- b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in section A.I.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.

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

Emissions Unit ID: R014

their total concentration, and on a consideration of the potential presence of interfering gases.

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

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.

- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.
3. The OC/VOC content of each coating and cleanup material used shall be based upon the use of Method 24 in 40 CFR, Part 60, Appendix A.

## VI. Miscellaneous Requirements

none

**A R E**

**PTI A**

**Issued: 3/28/2006**

Emissions Unit ID: R014

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R014 - polyester resin/fiberglass spray-up booth #2 and flash-off area with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-12379 issued on September 2, 1998 and modified on February 3, 1999.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

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**A R E Inc**

**PTI Application: 02 21184**

**Issue**

**Facility ID: 0285000291**

Emissions Unit ID: R014

**IV. Reporting Requirements**

none

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**A R E**

**PTI A**

**Issued: 3/28/2006**

Emissions Unit ID: R014

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**A R E**

**PTI A**

**Issued: 3/28/2006**

Emissions Unit ID: R015

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R015 - primer spray booth	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C)
The terms and conditions specified in this PTI supercede those of PTI 02-13470 issued on November 17, 1999.	OAC rule 3745-21-07(G)	
	OAC rule 3745-21-09(U)	

**A R E****PTI A****Issued: 3/28/2006**

Emissions Unit ID: R015

Applicable Emissions  
Limitations/Control  
Measures

See sections A.1.2.a A.1.2.b.

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)

Compliance with the requirements of OAC rule 3745-31-05(A)(3) shall include compliance with OAC rule 3745-21-09(U) and the requirements established pursuant to OAC rule 3745-31-05(C).

The emission limits specified in this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

For coatings used to coat metal parts:

3.5 lbs of volatile organic compounds (VOC)/gallon, excluding water and exempt solvents for extreme performance coatings

4.0 lbs of VOC/gallon, excluding water and exempt solvents for zinc rich primer coatings

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**A R E**

**P T I A**

**Issued: 3/28/2006**

Emissions Unit ID: R015

## 2. Additional Terms and Conditions

- 2.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.
- 2.b** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

none

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC/VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the amount of OC/VOC emitted for each coating and cleanup material and for all coatings and cleanup materials combined (i.e., b 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 A.III.I) for the preceding 11 calendar months plus the total OC/VOC emissions for the current calendar month].
  3. The permittee shall collect and record the following information each month for this emissions unit:
    - a. the company name and identification number of each coating and cleanup material employed;
    - b. the HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon;
    - c. the number of gallons of each coating and cleanup material employed;  
  
Note: The number of gallons of waste cleanup solvent collected for reuse or disposal shall be subtracted from the total employed.
    - d. the total emissions of each individual HAP, in pounds [i.e., summation of (b x c) for each individual HAP for all the coatings and cleanup materials;
    - e. the rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [i.e., the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from 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

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months plus the total HAP emissions for the current calendar month].

4. The permittee shall maintain the following records for each day that metal parts are coated:
  - a. the company name and identification number of each coating used for metal parts and whether each coating is an "extreme performance coating" or "zinc rich primer coating" as defined in OAC rule 3745-21-01; and
  - b. the VOC content of each coating used for metal parts as applied, excluding water and exempt solvents.

#### IV. Reporting Requirements

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

#### V. Testing Requirements

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

- 1.a 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 specified in section A.III.1. of these terms and conditions.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.2. above.

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

Applicable Compliance Method:

Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.3. above.

- 1.d Emission Limitation:  
For coatings used to coat metal parts:

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3.5 lbs of VOC/gallon, excluding water and exempt solvents for extreme performance coatings

4.0 lbs of VOC/gallon, excluding water and exempt solvents for zinc rich primer coatings

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the record keeping specified in section A.III.4. above.

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

**VI. Miscellaneous Requirements**

none

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R015 - primer booth with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-13470 issued on November 17, 1999.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
R016 - large component spray-up area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(C) OAC rule 3745-21-07(G)	See sections A.I.2.a through A.I.2.d. See section A.I.2.e and A.I.2.f. The emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
The terms and conditions specified in this PTI supercede those of PTI 02-13825 issued on March 15, 2000.		

**2. Additional Terms and Conditions**

- 2.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.
- 2.b The permanent total enclosure (PTE) serving this emissions unit shall be

maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

- 2.c** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation [i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened]. Therefore, the permittee will not be required to perform any additional monitoring, record keeping, reporting, or testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.
- 2.d** The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- 2.e** The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- 2.f** Emissions of hazardous air pollutants (HAPs) from emissions units R004 through R016 and all de minimis units\* and units exempt from the requirement to obtain a permit-to-install\*\* shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any 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.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any three-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees

Fahrenheit.

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the RTO is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the RTO was in operation, was less than 1,500 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for this

emissions unit:

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

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

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

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

- h. the total number of hours that the emissions unit was in operation;
  - i. the total daily OC/VOC emission rate for all resins, gelcoats, coatings, and cleanup materials, in pounds, (i.e., 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 A.III.I) 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,

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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].

#### **IV. Reporting Requirements**

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

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

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

#### **V. Testing Requirements**

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

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

Applicable Compliance Method:

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

- 1.b Emission Limitation:  
The OC/VOC emissions from emissions units R004 through R007, R012, R013, R014, and R016 combined, shall not exceed 5.0 pounds per hour and 21.90 tons per year from the RTO.
- Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the record keeping specified in sections A.III.3. and A.III.4. above.
- The annual emission limitation was created by multiplying the hourly emission limitation by 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly emission limitation is shown, compliance with the annual emission limitation will be assumed.
- 1.c Emission Limitation:  
The OC/VOC emissions from emissions units R004 through R016 combined, shall not exceed 58.40 tons per year, as a rolling, 12-month summation.
- Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.5. above.
- 1.d Emission Limitation:  
Emissions of HAPs from emissions units R004 through R016 and all de minimis units and units exempt from the requirement to obtain a permit-to-install shall not exceed 9.5 tons per year, as a rolling, 12-month summation for any single HAP and 24.5 tons per year, as a rolling, 12-month summation for all HAPs combined.
- Applicable Compliance Method:  
Compliance with this annual emission limitation shall be determined by the record keeping specified in section A.III.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 by March 26, 2006, coinciding with the date in the Title V permit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the

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capture and destruction efficiency requirements specified in section A.1.2.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.

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.

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

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.

- f. 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.

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

**VI. Miscellaneous Requirements**

none

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
R016 - large component spray-up area with permanent total enclosure and 50,000 cfm RTO	none	none
The terms and conditions specified in this PTI supercede those of PTI 02-13825 issued on March 15, 2000.		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

**III. Monitoring and/or Recordkeeping Requirements**

none

**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

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**VI. Miscellaneous Requirements**

none