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Facility Name: **A R E, Inc**  
Application Number: **02-2379**  
Date: **September 2, 1998**

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **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.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **A R E, Inc** located in **Wayne** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	R007			
R004			R013	
	R005 Cont'd			R014 Cont'd
	R006			P004
		R012		
R005		R012 Cont'd	R014	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Source Identification Description			Polyester resin station	
Paint spray booth no. 1	Paint spray booth no. 3	Gelcoat station		BAT Determination Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy
Paint spray booth no. 2	Paint spray booth no. 4	Polyester resin station	Relocated sanding/grinding booth	Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy	Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy	Applicable Federal & OAC Rules 3745-21-07 (G)	3745-21-07 (G)
Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy			3745-21-09 (U)	3745-21-09 (U)
			3745-31-05	3745-31-05
	Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy	Use of total permanent enclosure; RTO with 95 percent DE; and compliance with Air Toxics Policy	3745-21-07 (G)	3745-21-07 (G)
			3745-21-09 (U)	3745-21-09 (U)
			3745-31-05	3745-31-05
Use of total		Use of 4 bag filters		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-21-07 (G)	3745-21-07 (G)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	NO <sub>x</sub> - 1.0 pound per hour Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT
3745-21-09 (U)	3745-21-09 (U)	Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT
3745-31-05	3745-31-05	Equivalent to or less stringent than BAT	OC & VOC - 5.0 pounds per hour from RTO	OC & VOC - 5.0 pounds per hour from RTO
		OC & VOC - 5.0 pounds per hour from RTO	OC & VOC - 5.0 pounds per hour from RTO	COMBUSTION EMISSIONS NO <sub>x</sub> - 1.0 pound per hour
		COMBUSTION EMISSIONS NO <sub>x</sub> - 1.0 pound per hour	COMBUSTION EMISSIONS NO <sub>x</sub> - 1.0 pound per hour	Equivalent to or less stringent than BAT
3745-21-07 (G)	3745-17-07	Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT
3745-21-09 (U)	3745-17-07	Equivalent to or less stringent than BAT	Equivalent to or less stringent than BAT	OC & VOC - 5.0 pounds per hour from RTO
3745-31-05	3745-31-05	OC & VOC - 5.0 pounds per hour from RTO	OC & VOC - 5.0 pounds per hour from RTO	COMBUSTION EMISSIONS NO <sub>x</sub> - 1.0 pound per hour
		COMBUSTION EMISSIONS	COMBUSTION EMISSIONS	Equivalent to or less stringent than BAT
		COMBUSTION EMISSIONS	COMBUSTION EMISSIONS NO <sub>x</sub> - 1.0 pound	Equivalent to or less stringent than BAT

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Equivalent PM - 0.03 ent to grain per or less dscf stringe No visible nt than emissions BAT				
OC & VOC - 5.0 pounds per hour from RTO				
COMBUST ION EMISSIONS NO <sub>x</sub> - 1.0 pound per hour				
Equivalent ent to or less stringe nt than BAT				
Equivalent ent to or less stringe nt than BAT				

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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC/VOC	21.9*
PM	12.8

\* This is a decrease of 21.9 TPY of allowable VOC/OC emissions.

**PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30

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days after the completion of the performance test.

C. Tests shall be performed for the following source(s) and pollutants(s):

<u>Source</u>	<u>Pollutant(s)</u>
R004 - R007, R012 - R014	VOC/OC

### MONITORING REQUIREMENTS

A **temperature** monitor shall be installed on the **R004 - R007, R012 - R014**. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087**.

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#### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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## **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

### **INTRODUCTION**

The A.R.E., Inc., facility in Mt. Eaton consists of two separate buildings designated as Plants No. 1 and No.2. The facility produces FRP and aluminum truck accessories. This permit involves plant #1. The four paint spray booths will be modified; a new gelcoat booth and flash-off area will be added; two new polyester resin/fiberglass spray-up stations and flash-off areas will be added; and a new sanding/grinding booth will be installed. The currently existing gelcoat booth (R001) and polyester resin spray-up booth (R002) will be removed.

### **A. Emission Limitations and Control Requirements**

1. The new gelcoat booth and two resin spray-up operations with associated flash-off areas will be installed in a total permanent enclosure. The four paint booths will be modified to be total permanent enclosures. These seven emission units will be exhausted to a 50,000 cfm regenerative thermal oxidizer with a minimum destruction efficiency of 95 percent. The facility has proposed emissions from the oxidizer be restricted to 5 pounds VOC/OC per hour.
2. The new sanding/grinding booth will be controlled by four bag filter devices which exhaust back into the building. The emissions will be restricted to 0.03 grain per dry standard cubic foot, which totals 2.93 pounds per hour. There will be no visible emissions.
3. The oxidizer has a gas-fired burner with a heat input of 10.0 MMBtu/hour. The NO<sub>x</sub> emissions from combustion shall not exceed 1.0 pound per hour.

### **B. OPERATIONAL RESTRICTIONS**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. Each permanent total enclosure shall be maintained under negative pressure, at a minimum face velocity that is not less than 200 feet per minute across all natural draft openings, whenever the emissions units are in operation.

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**C. Monitoring and Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
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 thermal incinerator, when any associated emissions unit was in operation, was less than 1450 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 for each day for the coating (R004-R007), gelcoat spay-up (R012), polyester resin spay-up (R013, R014), and clean-up operations:
  - a. the company identification for each such material employed;
  - b. the number of gallons of each such material employed;
  - c. the organic compound content of each such material, in pounds per gallon;
  - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the

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overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

- e. the total number of hours the associated emissions units were in operation; and,
- f. the average hourly controlled organic compound emission rate for all such materials, [i.e., (d)/(e), in pounds per hour (average)].

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted to the Ohio EPA Northeast District Office and shall be received within 45 days of any incident.
2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly controlled organic compound emissions from the coating, gelcoat spray-up, polyester resin spray-up, and clean-up operations exceeded 5 pounds per hour, and the actual average hourly controlled organic compound emissions for each such day.
3. These reports shall be submitted to the Ohio EPA Northeast District Office and shall be received within 45 days of any incident.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

0.03 grain per dry standard cubic foot of exhaust from 4 bag filters

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

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b. Emission Limitation

No visible emissions

Applicable Compliance Method

OAC rule 3745-17-03(B) (1), if requested

c. Emission Limitation

5.0 pounds per hour from RTO

Applicable Compliance Method

OAC rule 3745-21-10(B). Recordkeeping specified above shall be used to determine compliance. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the organic materials. Results of the latest emissions testing shall be used to determine actual emissions. When calculating gelcoat emissions, an emission factor of 19.9 percent shall be used. When calculating polyester resin emissions, an emission factor of 12 percent shall be used. These emission factors are from the CFA recommended emission factors released by US EPA on March 18, 1998.

d. Emission Limitation

1.0 pound NO<sub>x</sub> per hour from RTO combustion

Applicable Compliance Method

Method 7 through 7E or Method 20 of 40 CFR Part 60, Appendix A, if requested

e. Emission Limitation

Use of total permanent enclosure

Applicable Compliance Method

Method 204 through 204F of 40 CFR Part 60, Appendix A

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f. Emission Limitation

95 percent Destruction Efficiency in RTO

Applicable Compliance Method

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

- i. the emission testing shall be conducted within 3 months of startup of the RTO;
- ii. the emission testing shall be conducted to demonstrate compliance with the 95 percent destruction efficiency;
- iii. the following test method(s) shall be employed to demonstrate compliance - 18, 18A, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. the test(s) shall be conducted while the emissions units are operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office;
- v. 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. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in

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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. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

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District Office.

**F. Miscellaneous Requirements**

1. None.