

Statement of Basis For Title V Permit

Company Name	A.R.E., Inc. - Massillon	
Premise Number	15 76 13 1793	
Number of Non-insignificant Emissions Units	eleven (11)	
What makes this facility a Title V facility?	The potential to emit for styrene exceeds the 10 tpy Title V applicability threshold.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3475-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
N/A			

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
	Paint Spray Booths:									
K001 K002 K003 K004	The emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a total permanent enclosure consistent with conditions demonstrated during the most recent performance test.	31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp & Misc. - none needed

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
K001 K002 K003 K004 cont.	The combined Volatile Organic Compound (VOC) emissions from emissions units K001- K004 shall not exceed 1.8 tons/month and 21.6 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined Organic Compound (OC) emissions from emissions units K001-K004 shall not exceed 1.8 tons/month and 21.6 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The OC emissions from this emissions unit shall not exceed 1.84 pounds/hour and 8.06 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. * See P001
	The VOC emissions from this emissions unit shall not exceed 1.84 pounds/hour and 8.06 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. * See P001
	The particulate matter (PM) emissions from this emissions unit shall not exceed 2.41 tons/yr.	31-05(A)(3)	N	N	N	N	N	Y	N	OR - Dry exhaust filtration system M, R, Rp, Misc. - not needed.
	As part of BAT, the minimum capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight. Organic compound emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. (These limits only apply to the emissions from the use of peel coats since these emissions are uncontrolled.)	31-05(A)(3)	N	Y	N	N	N	Y	N	M - Log of downtime OR, R, Rp, Misc. - none needed.
		21-07(G)(2)	N	N	Y	Y	Y	Y	N	M - coating usage OR, Misc. - none needed.

OR - dry filtration system

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
K001 K002 K003 K004 cont.	Visible emissions from the regenerative thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)	Y	N	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	Particulate emissions shall not exceed 0.551 lb/hr for this emissions unit.	17-11	Y	N	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	Fiberglass Operations:	SIP	Other	OR	M	R	Rp	ET	Misc.	Comments
P001	The combined Volatile Organic Compound (VOC) emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined styrene emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined Organic Compound (OC) emissions from emissions units P001, P002, and P003 shall not exceed 3.7 tons/month and 44.4 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The OC emissions from this emissions unit shall not exceed 2.5 pounds/hour and 10.95 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The VOC emissions from this emissions unit shall not exceed 2.35 pounds/hour and 10.29 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P001 cont.	The styrene emissions from this emissions unit shall not exceed 2.35 pounds/hour and 10.29 tons/year. 20% opacity, 6-minute average (stack)	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The particulate matter (PM) emissions from this emissions unit shall not exceed 2.41 tons/yr.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	As part of BAT, the minimum capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	Visible emissions from the regenerative thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	PM emissions shall not exceed 0.551 lb/hr for this emissions unit.	17-11	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	The emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a total permanent enclosure consistent with conditions demonstrated during the most recent performance test.	31-05(A)3	N	N	N	N	N	Y	N	OR, M, R, Rp & Misc. - none needed.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P002	The combined Volatile Organic Compound (VOC) emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined styrene emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined Organic Compound (OC) emissions from emissions units P001, P002, and P003 shall not exceed 3.7 tons/month and 44.4 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The OC emissions from this emissions unit shall not exceed 4.04 lbs/hr, 1.48 tons/month and 10.95 tons/yr.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The VOC emissions from this emissions unit shall not exceed 3.3 lbs/hr, 1.2 tons/month and 14.45 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The styrene emissions from this emissions unit shall not exceed 3.3 lbs/hr, 1.2 tons/month and 14.45 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The particulate matter (PM) emissions from this emissions unit shall not exceed 2.41 tons/yr.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	As part of BAT, the minimum capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
					N	N	N	Y	N	M, R, Rp, Misc. - none needed

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P002 cont.	Visible emissions from the regenerative thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	PM emissions shall not exceed 0.551.	17-11	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed.
	As part of BAT, the capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	Misc. - none needed.
	The emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a total permanent enclosure consistent with conditions demonstrated during the most recent performance test.	31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp & Misc. - none needed.
P003	The combined Volatile Organic Compound (VOC) emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The combined styrene emissions from emissions units P001, P002, and P003 shall not exceed 3.06 tons/month and 36.72 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P003 cont.	The combined Organic Compound (OC) emissions from emissions units P001, P002, and P003 shall not exceed 3.7 tons/month and 44.4 tons/year.	31-05(D)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	The OC emissions from this emissions unit shall not exceed 4.78 lbs/hr, 1.75 tons/month and 20.94 tons/yr.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The VOC emissions from this emissions unit shall not exceed 3.93 lbs/hr, 1.43 tons/month and 17.21 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The styrene emissions from this emissions unit shall not exceed 3.93 lbs/hr, 1.43 tons/month and 17.21 tons/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed. These hourly allowables represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance.
	The particulate matter (PM) emissions from this emissions unit shall not exceed 2.41 tons/yr.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed
	As part of BAT, the minimum capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight.	31-05(A)(3)	N	Y	N	N	N	Y	N	OR - RTO temperature parameter restrictions Misc. - none needed.
	Visible emissions from the regenerative thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)	N	Y	N	N	N	Y	N	OR - dry filtration system M, R, Rp, Misc. - none needed
	PM emissions shall not exceed 0.551.	17-11	N	Y	N	N	N	Y	N	OR - dry filtration system

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P003 cont.	The emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a total permanent enclosure consistent with conditions demonstrated during the most recent performance test.	31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp & Misc. - none needed.
	Sanding & Grinding Area	SIP	Other	OR	M	R	Rp	ET	Misc.	Comments
P006	Organic compound (OC) emissions shall not exceed 10 pounds/day, 0.15 ton/month and 1.83 tons/year.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of cleanup solvent & coating usage.
	Volatile organic compound (VOC) emissions shall not exceed 10 pounds/day, 0.15 ton/month and 1.83 tons/year.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of cleanup solvent & coating usage.
	Particulate matter (PM) emissions shall not exceed 0.04 pound/hour and 0.18 ton/year.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	Misc. - none needed. Pressure drop monitoring.
	Final Prep Area									

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P009	The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of solvent usage.
	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of solvent usage.
	Final Prep Area	SIP	Other	OR	M	R	Rp	ET	Misc.	Comments
P010	The Organic Compound (OC) emissions from this emissions unit shall not exceed 0.19 lb/hr, 0.056 ton/month, and 0.67 ton/yr.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of the monthly amount of paint mixed and of the number of paint guns cleaned.
	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 0.19 lb/hr, 0.056 ton/month, and 0.67 ton/yr.	31-05(A)(3)	N	N	Y	Y	Y	Y	N	OR, Misc. - none needed. Monitoring of the monthly amount of paint mixed and of the number of paint guns cleaned. The hourly limits represent the maximum production capacity of this emissions unit. No hourly recordkeeping is required to demonstrate compliance .

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P010 cont.	As part of BAT, the capture efficiency shall be 100% and the minimum destruction efficiency shall be 95% by weight. The emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a total permanent enclosure consistent with conditions demonstrated during the most recent performance test.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	OR - RTO temperature parameter restrictions misc. - none needed.
		31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp, Misc. - none needed.
	Mold cleaning & release application booth	SIP	Other	OR	M	R	Rp	ET	Misc.	Comments
P011	Organic Compound (OC) emissions shall not exceed 10.38 lbs/day and 1.89 tons/yr. As part of BAT, the minimum capture efficiency shall be 100% by weight and the minimum destruction efficiency shall be 95% by weight.	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	Misc. - none needed. This hourly allowable represents the maximum production capacity of this emissions unit. No hourly recordkeeping is required. Monthly recordkeeping of mold release cleaners, cleaners & cleanup solvents.
		31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp, Misc. - none needed.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc.	Comments
		SIP (3745-)	Other							
P011 cont.	This emissions unit shall be totally enclosed such that OC/VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. The operation of this emissions unit shall conform with the requirements for a permanent total enclosure (PTE) consistent with conditions demonstrated during the most recent performance test.	31-05(A)(3)	N	N	N	N	N	Y	N	OR, M, R, Rp & Misc. - none needed.
	High Volume Low Pressure (HVLP) spray guns shall be employed for any material that is applied by the use of a spray gun.	31-05(A)(3)	N	N	N	N	N	N	N	OR, M, R, Rp, ET, & Misc. - none needed.
	Visible emissions from the regenerative thermal stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)	N	Y	N	N	N	Y	N	M, R, Rp & Misc. - none needed.
	PM emissions shall not exceed 0.551 lb/hr.	17-11	N	N	N	N	N	Y	N	OR, M, R, Rp, & Misc. - none needed.
	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.	21-07(G)(2)	N	N	N	N	N	Y	N	OR, M, R, Rp, & Misc. - none needed.

EU = emissions unit ID

OR = operational restriction

M = monitoring requirements

R = record keeping requirements

Rp = reporting requirements

Misc. = miscellaneous requirements

ET = emission testing requirements (not including compliance method terms)