



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/16/01

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

02-85-00-0291
A.R.E., Inc. - Mount Eaton Facility
Ralph Gatti
400 Nave Road
P.O. Box 1100
MASSILLON, OH 44648

Dear Ralph Gatti:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 01/31/00. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date:	Effective Date:	Expiration Date:
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This document constitutes issuance of a Title V permit for Facility ID: 02-85-00-0291 to:
A.R.E., Inc. - Mount Eaton Facility
17494 Dover Road
P.O. Box 343
Mount Eaton, OH 44659

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P003 (Trim Booth) Excess material from fiberglass reinforced plastic parts produced in the RTM and sprayup areas is trimmed/routed off.	R007 (Paint Booth 4) Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.	R012 (Gelcoat Booth) Manual Spray Lay-Up of Gelcoat in an Open Mold.
P004 (Sanding/Grinding Booth) Sanding/grinding booth relocated from Massillon facility.	R008 (Gelcoat and Primer Booth 1) Primer and gelcoat is sprayed onto plugs and molds in an enclosed booth.	R013 (Polyester Resin Spray-Up Booth) Polyester Resin/Fiberglass Spray-Up Station and Flash-Off Area.
R004 (Paint Booth 1) Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.	R009 (Gelcoat and Primer Booth 2) Primer and gelcoat is sprayed onto plugs and molds in an enclosed booth. This booth is also used for injecting a two component foam product.	R014 (Polyester Resin Spray-Up Booth) Polyester Resin/Fiberglass Spray-Up Station and Flash-Off Area.
R005 (Paint Booth 2) Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.	R010 (Ceramic Spray-Up Area) Mixture of polyester resin and ceramic is sprayed to form plugs and molds in this area.	R015 (Primer Booth) The touch up paint booth that has been operating as a de minimis emission unit will be modified to a primer booth. A PTI is pending.
R006 (Paint Booth 3) Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.	R011 (Spray-up Area) Polyester resin and chopped fiberglass is sprayed onto plugs and molds constructed of wood and putty.	R016 (Large Component Spray-Up Area) Polyester resin and chopped fiberglass is sprayed onto molds which are too large to fit into the existing booths.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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. 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.

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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 reissuance, or modification, or for denial of a permit renewal application.

- 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, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than

the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed

therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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.

7. 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.

8. 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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z112 - paint gun cleaner 1,
Z113 - paint gun cleaner 2,
Z114 - paint gun cleaner 3,
Z115 - paint gun cleaner 4,
Z116 - paint gun cleaner 5,
Z117 - paint gun cleaner 6,
Z120 - welding areas,
Z121 - wood shop,
Z122 - RTM mixing tank,
Z123 - Fossliner booth,
Z124 - resin day tank,
Z125 - 200 gal. mixing tank,
Z126 - cnc cutting room,
Z127 - foam sanding station,
Z128 - sanding and grinding,
Z131 - paint mix room,
Z132 - prep area 1,
Z133 - prep area 2,
Z134 - prep area 3,
Z135 - prep area 4,
Z136 - mold maintenance booth 1,
Z137 - mold maintenance booth 2,
Z138 - fossliner booth,
Z205 - tooling area 1,
Z206 - tooling area 2,
Z207 - buffing station 1,
Z208 - buffing station 2,
Z209 - buffing station 3,
Z210 - buffing station 4,
Z211 - plug refinishing area 1,
Z212 - plug refinishing area 2, and
Z214 - paint gun cleaner 7.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Trim Booth (P003)

Activity Description: Excess material from fiberglass reinforced plastic parts produced in the RTM and sprayup areas is trimmed/routed off.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Grinding and routing plastic parts with a 2100 acfm positive pressure bag filter	OAC rule 3745-17-11	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 02-9316)	0.21 pound PE per hour and 0.92 ton PE per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07.

2. Additional Terms and Conditions

- 2.a The permittee shall employ a dust control system with a control efficiency of at least 99% for this emissions unit.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 - 4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse 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 the baghouse on weekly basis.

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 the baghouse did not comply with the allowable range specified above. The reports shall be submitted to the Ohio EPA Northeast District Office within 45 days of the excursion.

V. 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):

- 1.a Emission Limitation:
0.21 pound PE per hour

Applicable Compliance Method:
OAC rule 3745-17-03(B)(10), if requested.

- 1.b Emission Limitation:
0.92 ton PE per year

Applicable Compliance Method:
Compliance shall be determined by multiplying the hourly emission rate X actual hours of operation / 2000

- 1.c Compliance with the visible emission limitation in shall be determined in accordance with the following method: OAC rule 3745-17-03(B)(1), if requested.

- 1.d Emission Limitation:
The permittee shall employ a dust control system with a control efficiency of at least 99% for this emissions unit.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10), if requested.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sanding/Grinding Booth (P004)

Activity Description: Sanding/grinding booth relocated from Massillon facility.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sanding/Grinding Booth with 4 parallel, return-air, Torit negative-pressure, pulse jet bag filters; 3 with 2,500 acfm and 1 with 3,900 acfm, all located inside the building.	OAC rule 3745-17-07(B)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- Particulate emissions (PE) shall not exceed 0.03 grain per dscf of exhaust air and 12.8 tons per year.
- No visible emissions from the exhaust of the dust collectors.

II. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 2 - 4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse 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 baghouse on weekly basis.
- 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 baghouse 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 Director (Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. 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):
 - 1.a Emission Limitation:
0.03 grain per dry standard cubic foot of exhaust air

Applicable Compliance Method:
If required, compliance shall be determined by stack testing according to OAC rule 3745-17-03(B)(10) (Method 5, 40 CFR 60, Appendix A).
 - 1.b Emission Limitation:
12.8 tons PE per year

Applicable Compliance Method:
Compliance shall be determined by multiplying the hourly emission rate X actual hours of operation / 2000
 - 1.c Emission Limitation:
No visible emissions

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1), if requested. Compliance with the no visible emission limit for the exhausts from the dust collectors shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth 1 (R004)

Activity Description: Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #1 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a through A.I.2.f below.
	OAC rule 3745-21-09(U)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pound per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, and R014, 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the coatings and cleanup materials x [1-overall control efficiency]);
 - e. the total number of hours any VOC emissions from the emissions units were vented to the thermal oxidizer; and
 - f. the average hourly controlled VOC emission rate, (i.e., d/e, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

The permittee shall also submit deviation (excursion) reports which identify blocks of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA, Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.4.f and the emission testing specified in A.V.3 for the previous calendar year.

V. Testing Requirements (continued)

2.b Emission Limitation:

The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC/OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d.

2.c Emission Limitation:

NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

2.d Emission Limitation

100 % capture efficiency

95% destruction efficiency, by weight

Applicable Compliance Method

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emission testing specified in A.V.3.

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

a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.

c. 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 Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth 2 (R005)

Activity Description: Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #2 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a through A.I.2.f below.
	OAC rule 3745-21-09(U)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pound per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, and R014, 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the coatings and cleanup materials x [1-overall control efficiency]);
 - e. the total number of hours any VOC emissions from the emissions units were vented to the thermal oxidizer; and
 - f. the average hourly controlled VOC emission rate, (i.e., d/e, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

The permittee shall also submit deviation (excursion) reports which identify blocks of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA, Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.4.f and the emission testing specified in A.V.3.

V. Testing Requirements (continued)

2.b Emission Limitation:

The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC/OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

2.c Emission Limitation:

NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

2.d Emission Limitation

100 % capture efficiency

95% destruction efficiency, by weight

Applicable Compliance Method

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emissions testing specified in A.V.3.

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

a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.

c. 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 Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth 3 (R006)

Activity Description: Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #3 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a through A.I.2.f below.
	OAC rule 3745-21-09(U)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pound per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, and R014, 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the coatings and cleanup materials x [1-overall control efficiency]);
 - e. the total number of hours any VOC emissions from the emissions units were vented to the thermal oxidizer; and
 - f. the average hourly controlled VOC emission rate, (i.e., d/e, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

The permittee shall also submit deviation (excursion) reports which identify blocks of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA, Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.4.f and the emission testing specified in A.V.3.

V. Testing Requirements (continued)

2.b Emission Limitation:

The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC/OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

2.c Emission Limitation:

NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

2.d Emission Limitation

100 % capture efficiency

95% destruction efficiency, by weight

Applicable Compliance Method

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emission testing specified in A.V.3.

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

a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.

c. 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 Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth 4 (R007)

Activity Description: Paint is applied and cured by heat onto fiberglass reinforced plastic truck accessories. Occasionally, aluminum truck caps are painted.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #4 and oven with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a through A.I.2.f below.
	OAC rule 3745-21-09(U)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC emissions from emissions units R004, R005, R006, R007, R012, R013 and R014, combined shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pound per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, and R014, 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the coatings and cleanup materials x [1-overall control efficiency]);
 - e. the total number of hours any VOC emissions from the emissions units were vented to the thermal oxidizer; and
 - f. the average hourly controlled VOC emission rate, (i.e., d/e, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

The permittee shall also submit deviation (excursion) reports which identify blocks of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA, Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.4.f and the emission testing specified in A.V.3.

V. Testing Requirements (continued)

2.b Emission Limitation:

The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC/OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

2.c Emission Limitation:

NO_x - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

2.d Emission Limitation

100 % capture efficiency

95% destruction efficiency, by weight

Applicable Compliance Method

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emissions testing specified in A.V.3.

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

a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.

b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.

c. 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 Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gelcoat and Primer Booth 1 (R008)

Activity Description: Primer and gelcoat is sprayed onto plugs and molds in an enclosed booth.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer and gelcoat sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-31-05(A)(3) PTI 02-09316	7.3 tons OC per year, including all cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07(A)	20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)	0.551 lb particulate emissions (PE) per hour.
	OAC rule 3745-21-07(G)(2)	8 pound of OC per hour and 40 pounds of OC per day

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A. III. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for the gelcoat operation:
 - a. the identification and number of pounds of each resin employed;
 - b. the OC content of each resin, in percent by weight;
 - c. the amount of organic compound (styrene) emitted for each resin and for all resins combined, in pounds, calculated using the emission factors for styrene emissions from gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - d. the amount of cleanup solvent employed, in pounds;
 - e. the weight of waste cleanup solvent collected for reuse or disposal, in pounds;
 - f. the weight of evaporated cleanup solvent, which is estimated by subtracting the weight of waste cleanup solvent from the weight of the cleanup solvent employed (i.e., c-d), in pounds;
 - g. the total number of hours that the emissions unit was in operation;
 - h. the total daily organic compound emission rate for all resins and cleanup solvents, in pounds, (i.e. the sum of c for each resin employed plus f); and
 - i. the average hourly organic compound emission rate, in pounds per hour, (i.e., h divided by g).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly volatile organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the volatile organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. 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):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2.i.

To calculate the daily OC emissions for each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

Where:

E = daily organic compound emissions from each resin, in pounds per day

M = the amount of the resin employed, in gallons per day;

D = the density of the resin, in pounds per gallon;

EF = the emission factor for styrene emissions for gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

The total daily OC emissions from the emissions unit are equal to the sum of the OC emissions from all the resins and photochemically reactive cleanup materials employed.

- 1.b** Emission Limitation:
40 pounds of OC emissions per day

Applicable Compliance Method:

Compliance shall be determined according to the record keeping specified in A.III.2.h.

- 1.c** Emission Limitation:
7.3 tons OC per year

Applicable Compliance Method:

Compliance shall be determined by daily record keeping as specified in A.III.2.h and shall be calculated as the sum of all the daily total OC emissions for the previous year.

- 2.** Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gelcoat and Primer Booth 2 (R009)

Activity Description: Primer and gelcoat is sprayed onto plugs and molds in an enclosed booth. This booth is also used for injecting a two component foam product.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer and gelcoat sprayed onto plugs and molds in an enclosed booth.	OAC rule 3745-31-05(A)(3) PTI 02-09316	7.3 tons OC per year, including all cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07(A)	20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)	0.551 lb particulate emissions (PE) per hour.
	OAC rule 3745-21-07(G)(2)	8 pound of OC per hour and 40 pounds of OC per day

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A. III. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for the gelcoat operation:
 - a. the identification and number of pounds of each resin employed;
 - b. the OC content of each resin, in percent by weight;
 - c. the amount of organic compound (styrene) emitted for each resin and for all resins combined, in pounds, calculated using the emission factors for styrene emissions from gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - d. the amount of cleanup solvent employed, in pounds;
 - e. the weight of waste cleanup solvent collected for reuse or disposal, in pounds;
 - f. the weight of evaporated cleanup solvent, which is estimated by subtracting the weight of waste cleanup solvent from the weight of the cleanup solvent employed (i.e., c-d), in pounds;
 - g. the total number of hours that the emissions unit was in operation;
 - h. the total daily organic compound emission rate for all resins and cleanup solvents, in pounds, (i.e. the sum of c for each resin employed plus f); and
 - i. the average hourly organic compound emission rate, in pounds per hour, (i.e., h divided by g).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly volatile organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the volatile organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. 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):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2.i.

To calculate the daily OC emissions for each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

Where:

E = daily organic compound emissions from each resin, in pounds per day

M = the amount of the resin employed, in gallons per day;

D = the density of the resin, in pounds per gallon;

EF = the emission factor for styrene emissions for gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

The total daily OC emissions from the emissions unit are equal to the sum of the OC emissions from all the resins and photochemically reactive cleanup materials employed.

- 1.b** Emission Limitation:
40 pounds of OC emissions per day

Applicable Compliance Method:

Compliance shall be determined according to the record keeping specified in A.III.2.h.

- 1.c** Emission Limitation:
7.3 tons OC per year

Applicable Compliance Method:

Compliance shall be determined by daily record keeping as specified in A.III.2.h and shall be calculated as the sum of all the daily total OC emissions for the previous year.

- 2.** Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ceramic Spray-Up Area (R010)

Activity Description: Mixture of polyester resin and ceramic is sprayed to form plugs and molds in this area.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hand layup of polyester resin and fiberglass mat to form plugs and molds	OAC rule 3745-31-05(A)(3) PTI 02-09316	7.3 tons OC per year, including all cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07(A)	20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)	0.551 lb particulate emissions (PE) per hour.
	OAC rule 3745-21-07(G)(2)	8 pounds of OC per hour and 40 pounds of OC per day

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A. III. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for the spray-up operation:
 - a. the identification and number of pounds of each resin employed;
 - b. the OC content of each resin, in percent by weight;
 - c. the amount of organic compound (styrene) emitted for each resin and for all resins combined, in pounds, calculated using the emission factors for styrene emissions from manual application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - d. the amount of cleanup solvent employed, in pounds;
 - e. the weight of waste cleanup solvent collected for reuse or disposal, in pounds;
 - f. the weight of evaporated cleanup solvent, which is estimated by subtracting the weight of waste cleanup solvent from the weight of the cleanup solvent employed (i.e., c-d), in pounds;
 - g. the total number of hours that the emissions unit was in operation;
 - h. the total daily organic compound emission rate for all resins and cleanup solvents, in pounds, (i.e. the sum of c for each resin employed plus f); and
 - i. the average hourly organic compound emission rate, in pounds per hour, (i.e., h divided by g).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly volatile organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the volatile organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. 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):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2.i.

To calculate the daily OC emissions for each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

Where:

E = daily organic compound emissions from each resin, in pounds per day

M = the amount of the resin employed, in gallons per day;

D = the density of the resin, in pounds per gallon;

EF = the emission factor for styrene emissions for mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

The total daily OC emissions from the emissions unit are equal to the sum of the OC emissions from all the resins and photochemically reactive cleanup materials employed.

- 1.b** Emission Limitation:
40 pounds of OC emissions per day

Applicable Compliance Method:

Compliance shall be determined according to the record keeping specified in A.III.2.h.

- 1.c** Emission Limitation:
7.3 tons OC per year

Applicable Compliance Method:

Compliance shall be determined by daily record keeping as specified in A.III.2.h and shall be calculated as the sum of all the daily total OC emissions for the previous year.

- 2.** Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray-up Area (R011)

Activity Description: Polyester resin and chopped fiberglass is sprayed onto plugs and molds constructed of wood and putty.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Polyester resin and chopped fiberglass sprayed onto plugs and molds constructed of wood and putty	OAC rule 3745-31-05(A)(3) PTI 02-09316	7.3 tons OC per year, including all cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07(A)	20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)	0.551 lb particulate emissions (PE) per hour.
	OAC rule 3745-21-07(G)(2)	8 pound of OC per hour and 40 pounds of OC per day

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A. III. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for the spray-up operation:
 - a. the identification and number of pounds of each resin employed;
 - b. the OC content of each resin, in percent by weight;
 - c. the amount of organic compound (styrene) emitted for each resin and for all resins combined, in pounds, calculated using the emission factors for styrene emissions from gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - d. the amount of cleanup solvent employed, in pounds;
 - e. the weight of waste cleanup solvent collected for reuse or disposal, in pounds;
 - f. the weight of evaporated cleanup solvent, which is estimated by subtracting the weight of waste cleanup solvent from the weight of the cleanup solvent employed (i.e., c-d), in pounds;
 - g. the total number of hours that the emissions unit was in operation;
 - h. the total daily organic compound emission rate for all resins and cleanup solvents, in pounds, (i.e. the sum of c for each resin employed plus f); and
 - i. the average hourly organic compound emission rate, in pounds per hour, (i.e., h divided by g).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9316, issued on February 28, 1996: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly volatile organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the volatile organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. 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):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2.i.

To calculate the daily OC emissions for each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

Where:

E = daily organic compound emissions from each resin, in pounds per day

M = the amount of the resin employed, in gallons per day;

D = the density of the resin, in pounds per gallon;

EF = the emission factor for styrene emissions for mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

The total daily OC emissions from the emissions unit are equal to the sum of the OC emissions from all the resins and photochemically reactive cleanup materials employed.

- 1.b** Emission Limitation:
40 pounds of OC emissions per day

Applicable Compliance Method:

Compliance shall be determined according to the record keeping specified in A.III.2.h.

- 1.c** Emission Limitation:
7.3 tons OC per year

Applicable Compliance Method:

Compliance shall be determined by daily record keeping as specified in A.III.2.h and shall be calculated as the sum of all the daily total OC emissions for the previous year.

- 2.** Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gelcoat Booth (R012)

Activity Description: Manual Spray Lay-Up of Gelcoat in an Open Mold.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Gelcoat booth and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-21-07 (G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a. - A.I.2.f below.

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013 and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pounds per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.

II. Operational Restrictions (continued)

2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined:
 - a. the company identification for each resin and cleanup material employed;
 - b. the number of gallons of each resin and cleanup material employed;
 - c. the OC content of each resin and cleanup material, in pounds per gallon;
 - d. the uncontrolled OC emission rate from resin, in pounds per day, calculated using the emission factors for styrene emissions from gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - e. the total controlled OC emissions rate for all resins and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the cleanup materials plus the summation of d for each resin, times [1-overall control efficiency]);
 - f. the total number of hours any OC emissions from the emissions units were vented to the thermal oxidizer; and
 - g. the average hourly controlled OC emission rate, (i.e., e/f, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

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

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.4 and the emission testing specified in A.V.3.

To calculate the daily uncontrolled OC emissions rate from each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

where:

E= daily organic compound emissions from each resin, in pounds per day;

M= the amount of resin employed, in gallons per day;

D= the density of the resin, in pounds per gallon; and

EF= the emission factor for styrene emissions for gelcoat application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

- 2.b** Emission Limitation:
The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC and OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

- 2.c** Emission Limitation:
NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

- 2.d** Emission Limitation:
100 % capture efficiency
95% destruction efficiency, by weight

Applicable Compliance Method:

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emissions testing specified in A.V.3.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.
 - c. 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 Ohio EPA, Northeast District Office.
- e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

- 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 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 District Office.

5. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Polyester Resin Spray-Up Booth (R013)

Activity Description: Polyester Resin/Fiberglass Spray-Up Station and Flash-Off Area.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Polyester Resin/Fiberglass and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-21-07 (G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a. - A.I.2.f below.

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013 and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pounds per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.

II. Operational Restrictions (continued)

2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined:
 - a. the company identification for each resin and cleanup material employed;
 - b. the number of gallons of each resin and cleanup material employed;
 - c. the OC content of each resin and cleanup material, in pounds per gallon;
 - d. the uncontrolled OC emission rate from resin, in pounds per day, calculated using the emission factors for styrene emissions from mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - e. the total controlled OC emissions rate for all resin and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the cleanup materials plus the summation of d for each resin, times [1-overall control efficiency]);
 - f. the total number of hours any OC emissions from the emissions units were vented to the thermal oxidizer; and
 - g. the average hourly controlled OC emission rate, (i.e., e/f, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

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

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.4 and the emission testing specified in A.V.3.

To calculate the daily uncontrolled OC emissions rate from each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

where:

E= daily organic compound emissions from each resin, in pounds per day;

M= the amount of resin employed, in gallons per day;

D= the density of the resin, in pounds per gallon; and

EF= the emission factor for styrene emissions for mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

- 2.b** Emission Limitation:
The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC and OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

- 2.c** Emission Limitation:
NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

- 2.d** Emission Limitation:
100 % capture efficiency
95% destruction efficiency, by weight

Applicable Compliance Method:

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emissions testing specified in A.V.3.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.
 - c. 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 Ohio EPA, Northeast District Office.
- e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

- 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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Polyester Resin Spray-Up Booth (R014)

Activity Description: Polyester Resin/Fiberglass Spray-Up Station and Flash-Off Area.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Polyester Resin/Fiberglass and flash-off area with permanent total enclosure and 50,000 cfm regenerative thermal oxidizer (RTO)	OAC rule 3745-21-07 (G)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI 02-12379)	See A.I.2.a. - A.I.2.f below.

2. Additional Terms and Conditions

- 2.a. The volatile organic compounds (VOC) emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight. This is based upon the February 3, 1999 Permit to Install number 02-12379, which is federally enforceable.
- 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, and 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 VOC emissions from emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined, shall not exceed 5.0 pounds per hour from the RTO.
- 2.e. The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013 and R014, combined, shall not exceed 21.9 tons per year, including cleanup.
- 2.f. Combustion emissions shall not exceed 1.0 pounds per hour of NOx.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.

II. Operational Restrictions (continued)

2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-12379, issued on February 3, 1999: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. 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 thermal incinerator is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.
3. 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each day for the emissions units R004, R005, R006, R007, R012, R013, R014 and R016, combined:
 - a. the company identification for each resin and cleanup material employed;
 - b. the number of gallons of each resin and cleanup material employed;
 - c. the OC content of each resin and cleanup material, in pounds per gallon;
 - d. the uncontrolled OC emission rate from resins, in pounds per day, calculated using the emission factors for styrene emissions from mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999;
 - e. the total controlled OC emissions rate for all resins and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e., the summation of (b x c) for each of the cleanup materials plus the summation of d for each resin, times [1-overall control efficiency]);
 - f. the total number of hours any VOC emissions from the emissions units were vented to the thermal oxidizer; and
 - g. the average hourly controlled VOC emission rate, (i.e., e/f, in pounds per hour (average)).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which identify any 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in Section A.II.1. of this permit.

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

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly emission limitation specified in Section A.I.2.d.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA Northeast District Office) and shall be received by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2379, issued on February 3, 1999: A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emissions limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation:
5.0 lbs VOC/OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.4 and the emission testing specified in A.V.3.

To calculate the daily uncontrolled OC emissions rate from each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

where:

E= daily organic compound emissions from each resin, in pounds per day;

M= the amount of resin employed, in gallons per day;

D= the density of the resin, in pounds per gallon; and

EF= the emission factor for styrene emissions for mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

- 2.b** Emission Limitation:
The VOC and OC emissions from emissions units R004, R005, R006, R007, R012, R013, and R014, combined, shall not exceed 21.9 tons VOC and OC per year, including cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions as determined in A.III.4.d for the previous calendar year.

- 2.c** Emission Limitation:
NOx - 1.0 pound per hour

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (7/98 update) for natural gas combustion and the maximum capacity of the gas burners.

- 2.d** Emission Limitation:
100 % capture efficiency
95% destruction efficiency, by weight

Applicable Compliance Method:

Compliance shall be determined according to OAC rule 3745-21-10(C) and the emissions testing specified in A.V.3.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.a. and to establish the average combustion temperature within the thermal oxidizer.
 - c. 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 Ohio EPA, Northeast District Office.
- e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

- 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 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 District Office.

4. The VOC content of each coating and cleanup material used shall be based upon the use of USEPA Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Primer Booth (R015)

Activity Description: The touch up paint booth that has been operating as a de minimis emission unit will be modified to a primer booth. A PTI is pending.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer Spray Booth	OAC rule 3745-05(A)(3) PTI 02-13470	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-11	0.551 pound PE (particulate emissions) per hour
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-21-07 (G)(2)	8 pounds OC emissions per hour and 40 pounds OC emissions per day

2. Additional Terms and Conditions

- 2.a Organic Compound (OC) emissions shall not exceed 7.3 tons per year, including all cleanup material.
- 2.b PE shall not exceed 2.4 tons per year.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-13825, issued on November 17, 1999: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall daily collect and record the following information for the purpose of determining average hourly and daily emissions:
 - 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 organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day, (i.e. the sum of b times c for all coatings and cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, (i.e., d divided by e).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-13825, issued on November 17, 1999: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Northeast District Office of the Ohio EPA by January 31 of each year.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:

Compliance with the daily limitation shall be determined based upon the record keeping specified in A.III.2.f.

1.b Emission Limitation:
40 pounds of OC per day

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2.d.

1.c Emission Limitation:
7.3 tons OC per year, including all cleanup

Applicable Compliance Method:

Compliance shall be determined by summing the daily emissions, as described in Section A.III.2.d for the previous calendar year.

1.d Emission Limitation:
0.551 pound PM per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1 - TE) \times (1 - CE)$$

Where,

E = particulate matter emission rate (lb/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

1.e Emission Limitation:
2.4 tons PE per year

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined by multiplying the actual worst case hourly emission rate times the actual hours of operation and divide by 2000 pounds per ton.

1.f Emission Limitation:
20% opacity, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emission limitation in shall be determined in accordance with OAC rule 3745-17-03(B)(1), if requested.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Component Spray-Up Area (R016)

Activity Description: Polyester resin and chopped fiberglass is sprayed onto molds which are too large to fit into the existing booths.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Large components spray-up area located in a permanent total enclosure controlled by a 50,000 cfm regenerative thermal oxidizer (RTO).	OAC rule 3745-31-05(A)(3) PTI 02-13825	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC and VOC emissions from R004, R005, R006, R007, R012, R013, R014 and R016, combined shall not exceed 5.0 pounds per hour from the RTO.
- 2.b The OC and VOC emitted from this emissions unit shall be vented to a control device (a thermal oxidizer) with a minimum capture efficiency of 100% by weight and a minimum destruction efficiency of 95% by weight.
- 2.c 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.d 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, and testing to ensure the ongoing integrity of the PTE unless any parameter of the design or operation of the PTE is modified.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees Fahrenheit.
2. This emissions unit shall be totally enclosed such that all the OC 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 emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 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;
 - 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 emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer 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 the thermal incinerator was in operation, was less than 1500 degrees Fahrenheit.
 - b. a log of the downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each day for the large component spray-up area:
 - a. the identification and number of pounds of each resin employed;
 - b. the OC content of each resin, in percent by weight;
 - c. the daily, uncontrolled OC emission rate from resins, in pounds per day, calculated using the emission factors for styrene emissions from mechanical atomized application, in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Associate, International Cast Polymer Association and the Composites Institute, April 7, 1999.
 - d. the amount of cleanup solvent employed, in pounds;
 - e. the weight of waste cleanup solvent collected for reuse or disposal, in pounds;
 - f. the weight of evaporated cleanup solvent, which is estimated by subtracting the weight of waste cleanup solvent from the weight of the cleanup solvent employed (i.e., c-d), in pounds;
 - g. the total, controlled OC emissions rate for all coatings and cleanup materials, in pounds per day (calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance, i.e. the summation of c for each resin plus f, times [1- overall control efficiency]);
 - h. the total number of hours that the emissions unit was in operation;
 - i. the average hourly organic compound emission rate, in pounds per hour, (i.e., g divided by h).

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the organic materials

4. The permittee shall record the average hourly controlled OC emission rate from R004, R005, R006, R007, R012, R013, R014 and R016, combined.

IV. 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 oxidizer 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 identify blocks of downtime for the capture (collection) system control device and monitoring equipment when the associated emissions unit was in operation.
3. 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 thermal oxidizer exceeded 5 pounds, and the actual average hourly controlled organic compound emissions for each such day. These reports shall be submitted to the Ohio EPA Northeast District Office and shall be received within 45 days of any incident.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004, R005, R006, R007, R012, R013, R014, and R016, combined, for the previous calendar year. These reports shall be submitted to the Director (Ohio EPA Northeast District Office) and shall be received by January 31 of each year.

V. 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):

- 1.a Emissions Limitation:
5.0 pounds OC/VOC per hour from R004, R005, R006, R007, R012, R013, R014, and R016, combined, after the RTO

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.II.4. and the emissions testing specified in A.V.2.

To calculate the daily uncontrolled OC emissions rate from each resin, the permittee shall employ the following formula:

$$E = M \times D \times EF \times (\text{ton resin} / 2000 \text{ lbs resin})$$

where:

E= daily organic compound emissions from each resin, in pounds per day;

M= the amount of resin employed, in gallons per day;

D= the density of the resin, in pounds per gallon; and

EF= the emission factor for styrene emissions for mechanical atomized application, which is in pounds of styrene emitted per ton of resin employed, as noted in Table 3 of "Unified Emission Factors for Open Molding of Composites" by Engineering Environmental on behalf of the Composites Fabricators Association, International Cast Polymer Association and the Composites Institute, April 7, 1999.

- 1.b Emission Limitation:
100 % capture efficiency
95% destruction efficiency, by weight

Applicable Compliance Method:

Compliance shall be determined according to OAC rule 3745-21-10(C).

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirement.
 - a. The emissions testing shall be conducted within 2.5 years of the issuance of the final permit and within 6 months prior to permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture and destruction efficiency requirements specified in Section A.I.2.b. and to establish the average combustion temperature within the thermal oxidizer.
 - c. 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 Ohio EPA, Northeast District Office.

V. Testing Requirements (continued)

e. 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 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 Ohio EPA Northeast District Office's refusal to accept the results of the emissions 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.

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 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 District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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