

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 08-04835

A. Source Description

Goodrich Corporation, Inc. manufactures and coats wheels and manufactures brake assemblies for the aerospace industry. This PTI is for a sixth miscellaneous metal parts coating operation. The facility currently has five existing paint booths and several other miscellaneous operations, including sulfuric anodizing.

B. Facility Emissions and Attainment Status

Goodrich is currently minor for all criteria pollutants. Goodrich is located in Troy, Miami County, which is currently designated as attainment for all criteria pollutants, except ozone. Goodrich is requesting this synthetic minor for HAPs to accept TPY restrictions on both the individual and combination of HAPs. SM limitations were specified in an earlier PTI 08-04293 issued 06/11/2002 to establish the facility's potential HAPs emissions from their surface coating operations, exempting the facility from 40 CFR Part 63, Subpart M, the Surface Coating of Miscellaneous Metal Parts and Products MACT. This PTI 08-04835 contains facility wide limitations for the HAPs emissions, that will insure the facility will continue to be non-major for HAPs and exempt from MACT.

C. Source Emissions

This emissions unit contributes 5.6 TPY VOC, including cleanup to the facility's emissions.

D. Conclusion

This is a synthetic minor PTI containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below MACT thresholds. The inherent limitations due to the production type operation will maintain the HAP emissions of this facility below 10 TPY and 25 TPY. Therefore, monthly records of the HAPs are sufficient to demonstrate compliance with these limitations and no operation restrictions are required. Through federally enforceable terms and conditions and record keeping requirements, Goodrich will not trigger MACT or Title V permitting requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MIAMI COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 08-04835

Fac ID: 0855140039

DATE: 5/1/2007

Goodrich Corp
Mark Hartman
101 Waco St
Troy, OH 45373

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

RAPCA

MIAMI VALLEY REG PLANNING COMM

MIAMI COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04835** FOR AN AIR CONTAMINANT SOURCE FOR
Goodrich Corp

On 5/1/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Goodrich Corp**, located at **101 Waco St, Troy**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04835:

paint booth number 6.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04835

Application Number: 08-04835
Facility ID: 0855140039
Permit Fee: **To be entered upon final issuance**
Name of Facility: Goodrich Corp
Person to Contact: MarK Hartman
Address: 101 Waco St
Troy, OH 45373

Location of proposed air contaminant source(s) [emissions unit(s)]:

**101 Waco St
Troy, Ohio**

Description of proposed emissions unit(s):

paint booth number 6.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Goodrich Corp
PTI Application: 08-04835
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0855140039

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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,

Goodrich Corp
PTI Application: 08-04835

Facility ID: 0855140039

Issued: To be entered upon final issuance

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. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Goodrich Corp
PTI Application: 08-04835

Facility ID: 0855140039

Issued: To be entered upon final issuance

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

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Goodrich Corp

Facility ID: 0855140039

PTI Application: 08-04835

Issued: To be entered upon final issuance

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Goodrich Corp
PTI Application: 08-04835

Facility ID: 0855140039

Issued: To be entered upon final issuance

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
volatile organic compounds	5.6

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K002) - Misc. Metal Parts Paint Spray Booth with Filtration System

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(U)(2)(e)	The coating usage rate shall be less than or equal to 8 gallons per day.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V permitting requirements	<p>The emissions of hazardous air pollutants (HAP) from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on a rolling, 12-month summation.</p> <p>The VOC emissions from this emissions unit shall not exceed 4.8 tons per year, excluding cleanup, based on a rolling, 12-month summation.</p> <p>See section A.2.b.</p>

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxides (NO_x) and lead (Pb) emissions from this air contaminant source since the uncontrolled potential to emit for PE, SO₂, CO, NO_x and Pb is less than ten tons per year.
- 2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from this air contaminant source since the calculated annual emission for VOC is less than ten tons per year taking into account the federally enforceable rule limit of 8 gallons per day under OAC rule 3745-21-09-(U)(2)(e).

B. Operational Restrictions

Emissions Unit ID: **K002**

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line at the facility:
 - a. The name and identification number of each coating employed.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coatings employed.
2. The dry filtration system for control of particulate emissions shall be in operation whenever this emissions unit is in operation.

The permittee shall properly install, operate and maintain equipment to monitor and record the pressure drop across the dry filtration system while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall collect and record the following information each day:

- a. Whether or not the dry filtration system was in operation when the emissions unit was in operation.
 - b. The pressure drop across the filtration system, on a once per shift basis.
 - c. Whether or not the pressure drop across the filtration system was outside the acceptable range based upon the manufacturer's specifications.
3. The permittee shall collect and record the following information each month for emissions units K001, K002, R001, R002, R004, and R005:
 - a. The name and identification number of each coating material employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

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- c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.3.b.).
 - d. The number of gallons of each coating material employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.3.f.).
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of the products of C.3.b. times C.3.d. for each coating material plus the sum of the products of C.3.f. times C.3.h. for each cleanup material).
 - j. The total combined HAP emissions from all coating materials and cleanup materials employed, in pounds or tons per month (the sum of the products of C.3.c. times C.3.d. for each coating material plus the sum of the products of C.3.g. times C.3.h. for each cleanup material).
4. The permittee shall collect and record the following information each month for the entire facility:
- a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility, including the coating and cleanup material HAP emissions recorded in C.4.i. above.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility, including the coating and cleanup material HAP emissions recorded in C.3.j. above.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total

Emissions Unit ID: **K002**

thereafter, of the total individual HAP emission rate for each HAP employed at this facility.

- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

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D. Reporting Requirements

1. The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of any record showing that the filtration system was not in operation when the emissions unit was in operation.
 - b. An identification of all periods of time which the pressure drop across the filtration system was outside the range manufacturer's recommended range.
 - c. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

3. The permittee shall submit annual reports which specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

Issued: To be entered upon final issuance

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

Issued: To be entered upon final issuance

- a. Emission Limitation -
The coating usage rate shall be less than or equal to 8 gallons per day.

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1.

- b. Emission Limitation(s):
The emissions of hazardous air pollutants from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on a rolling, 12-month summations.

Applicable Compliance Method(s):
Compliance shall be determined by the recordkeeping requirements specified in Section C.3 and C.4.

- c. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 4.8 tons per year, excluding cleanup, based on a rolling, 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon compliance with the 8 gallons per day limitation.

F. Miscellaneous Requirements

None

Goodrich Corp
PTI Application: 08-04835
Issued: To be entered upon final issuance

Facility ID: 0855140039

Emissions Unit ID: **K002**

SIC CODE 3728 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Misc. Metal Parts Paint Spray Booth with Filtration System

DATE INSTALLED after issue of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	nonattainment				5.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: BAT is not applicable.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____