State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
MIAMI COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 08-04662
Fac ID: 0855140460
DATE: 3/22/2005

F and P America Mfg Inc
Dwight Humbert
2101 Corporate Dr
Troy, OH 45373-1076

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

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

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

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

Sincerely,

Michael W. Ahern

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

cc: **USEPA** **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 3/22/2005**
Terms and Conditions	**Effective Date: 3/22/2005**

FINAL PERMIT TO INSTALL 08-04662

Application Number:	08-04662
Facility ID:	0855140460
Permit Fee:	**$400**
Name of Facility:	F and P America Mfg Inc
Person to Contact:	Dwight Humbert
Address:	2101 Corporate Dr Troy, OH 45373-1076

Location of proposed air contaminant source(s) [emissions unit(s)]:
2101 Corporate Dr
Troy, **Ohio**

Description of proposed emissions unit(s):
Ch. 31 mod. replacing 08-03348 issued 10/18/95 to install E coat line with 2 ovens and PVC coating line with 1 oven.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

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

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

Pollutant	Tons Per Year
VOC	24.33

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	Applicable Rules/Requirements	OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment and Title V permitting requirements)
K001 - E-coat line with 2 ovens	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-09(U)(1)(c)	
	OAC rule 3745-31-05(C)	

*modification

Applicable Emissions Limitations/Control Measures	
The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-31-05(C).	
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.5 lbs/hr.	
The VOC content of the resin shall not exceed 0.4 pound of VOC per gallon	
The VOC content of the paste shall not exceed 0.4 pound of VOC per gallon	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The VOC emission rate from this emissions unit shall not exceed 24.09 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.	

2. Additional Terms and Conditions

2.a The 5.5 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b Water is used as the cleaning material.

B. Operational Restrictions

1. The maximum annual resin usage rate shall not exceed 96,360 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of resin, in the first twelve months does not need to be established.

2. The maximum annual paste usage rate shall not exceed 24,090 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of paste, in the first twelve months does not need to be established..

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The name and identification number of each material added to the electro deposition dip tank, as applied (resin and paste)

   b. The number of gallons of each material added to the E-coat concentrate i.e. resin and paste, as applied.

   c. The VOC content of each paste, as applied.

   d. The VOC content of each resin, as applied.

   e. The monthly VOC mass emissions rate, in tons.

   f. The rolling, 12-month summation of the monthly resin usage, in gallons.

   g. The rolling, 12-month summation of the monthly paste usage, in gallons.

   h. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., (g x c) + (f x d) divided by 2000 lbs/ton.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying E-coat concentrate, consisting of resin and paste, i.e., for VOC content. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month resin and paste usage limitation, in gallons and the actual rolling, 12-month combined resin and paste usage summation, in gallons, for each such month.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month.

4. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total VOC emissions in tons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance Method

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

   a. Emission Limitation-
      5.5 lbs VOC/hr

      Applicable Compliance Method-
      Compliance shall be determined by multiplying the maximum hourly E-coat concentrate resin (11.0 gals/hr)(0.40 lb VOC/gal including water) + (2.75 gals/hr)(0.40 lb VOC/gal including water) as applied.

   b. Emission Limitation -

Emissions Unit ID: **K001**

24.09 tons VOC/year, as a rolling 12-month summation

Applicable Compliance Method -
Compliance shall be based on record keeping as specified in Section C.1.h. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

c. Emission Limitation-
0.4 lb VOC/gallon of resin

0.4 lb VOC/gallon of paste

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. * Terms in this permit supercede those identified in PTI 08-3348 issued 10/18/95 and represents a 15.33 tons increase in the annual VOC allowable emissions rate.

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	Applicable Rules/Requirements	
K002 - PVC coating line w/oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment and Title V permitting requirements).
*modification		
	OAC rule 3745-21-09(U)(1)(c)	

Applicable Emissions Limitations/Control Measures
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4.7 lbs/hr, excluding cleanup and 0.24 ton/yr, including cleanup.
The VOC content of the PVC coating shall not exceed 0.1 pound of VOC per gallon.
The VOC content of the cleanup material shall not exceed 6.43 pound of VOC per gallon.
The requirements established pursuant to this rule also includes compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The VOC emission rate from this emissions unit shall not exceed 0.24 ton/yr, including cleanup, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

2.a The 4.7 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage rate shall not exceed 1,000 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of coating, in the first twelve months does not need to be established.

2. The maximum annual cleanup usage rate shall not exceed 60 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of cleanup material, in the first twelve months does not need to be established.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The name and identification number of each cleanup material employed.

   b. The VOC content of each cleanup material, in pounds per gallon.

   c. The number of gallons of each cleanup material employed.

   d. The name and identification number of each coating, as applied.

   e. The VOC content of each coating, as applied.

   f. The number of gallons of each coating employed.

   g. The monthly VOC mass emissions rate, in tons.

   h. The rolling, 12-month summation of the monthly coating and cleanup usage, in gallons.

   i. The rolling, 12-month summation of the monthly VOC mass emissions rate i.e., (b x c) + (e x f) divided by 2000 lbs/ton.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month coating and cleanup usage limitations, in gallons and the actual rolling, 12-month coating and cleanup usage summation, in gallons, for each such month.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month VOC emissions limitation, and the actual rolling, 12 month VOC emissions for each such month.

4. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total VOC emissions in tons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance Method

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

   a. Emission Limitation-
      4.7 lbs VOC/hr, excluding cleanup

      Applicable Compliance Method-
      Compliance shall be determined by multiplying the maximum hourly coating usage rate of 47.0 gallons, as applied times the maximum VOC content of 0.1 pound per gallon for each coating employed in this emissions unit.

b. Emission Limitation -
0.24 ton VOC/year, including cleanup as a rolling 12-month summation

Applicable Compliance Method -
Compliance shall be based on record keeping as specified in Section C.1.i of this permit.

c. Emission Limitation-
0.1 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section C.1 of this permit. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. * Terms in this permit supercede those identified in PTI 08-3348 issued 10/18/95 and represents a 13.96 tons decrease in the annual VOC allowable emissions rate.