State of Ohio Environmental Protection Agency

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

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04819
Fac ID: 0855140460
DATE: 4/17/2007

F and P America Mfg Inc
Mark Kline
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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **RAPCA**

FINAL PERMIT TO INSTALL 08-04819

Application Number:	08-04819
Facility ID:	0855140460
Permit Fee:	**$400**
Name of Facility:	F and P America Mfg Inc
Person to Contact:	Mark Kline
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):
chapter 31 modification replacing PTI 08-04662 issued 3/25/05 for K001 only and PTI 08-03631 issued 1/3/97 for K004 to increase usage and emission limits.

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

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 (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, 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
volatile organic compound	45.12

Emissions Unit ID: **K001**

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 - (K001) - E-coat line with 2 ovens modified post 08/03/2006

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also includes compliance with the requirement of OAC rule 3745-31-05(C). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 7.7 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.
OAC rule 3745-21-09(U)(1)(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).
OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment NSR and Title V permitting requirements)	The VOC emission rate from this emissions unit shall not exceed 33.73 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

2.a The use of cleanup material other than water is prohibited in this emissions unit.

B. Operational Restrictions

1. The emissions of VOC from this emissions unit shall not exceed 33.73 tons per year, based upon a rolling, 12-month summation of the monthly emissions. This emissions unit has been in operation for more than 12 months and, as such, the permittee has

existing records to generate the rolling, 12-month summation of the VOC emissions, upon issuance of this permit.

2. The maximum annual resin usage rate shall not exceed 134,904 gallons based on a rolling, 12-month summation of the monthly resin usage rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the resin usage rate, upon issuance of this permit.

3. The maximum annual paste usage rate shall not exceed 33,726 gallons based on a rolling, 12-month summation of the monthly paste usage rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the paste usage rate, upon issuance of this permit.

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 material added to the electro deposition dip tank, as applied (resin and paste).

   b. The number of gallons of each material added to the electro deposition dip tank 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 include the following information:

   a. an identification of month during which the rolling, 12- month usage limitations for resin and paste exceeded 134,904 gallons and 33,726 gallons respectively.

   b. an identification of month during which the rolling, 12- month emissions limitation for VOC exceeded 33.73 tons per year.

4. These quarterly deviation reports (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA 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 also submit annual reports that specify the total VOC 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 for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

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

   a. Emission Limitation-
   The VOC emissions from this emissions unit shall not exceed 7.7 lbs/hr.

   Applicable Compliance Method-
   Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

   If required, the permittee shall demonstrate compliance with the hourly allowable

VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25,or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation -
The VOC emission rate from this emissions unit shall not exceed 33.73 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method -
Compliance shall be based on record keeping as specified in Section C.1.h.

c. Emission Limitation-
The VOC content of the resin and paste shall not exceed 0.4 pound of VOC per gallon respectively.

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), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, 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.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

F. Miscellaneous Requirements

1. Terms in this permit for emissions unit K001 supercede those identified in PTI 08-04662 issued 03/22/2005 and represent a 9.64 tons increase in the annual VOC allowable emissions rate.

Emissions Unit ID: **K004**

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 - (K004) - heat resist coating line modified post 08/03/2006

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule also include compliance with the requirement of OAC rule 3745-21-09(U)(1)(c). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.6 lbs/hr and 11.39 tons/yr.
OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coatings shall not exceed 3.0 pounds VOC per gallon of coating, excluding water and exempt solvents.

2. Additional Terms and Conditions

2.a The use of cleanup material other than water is prohibited in this emissions unit.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating (excluding water and exempt solvents), as applied;

   c. the number of gallons (excluding water and exempt solvents) of each coating

employed; and

d. the total VOC emissions from all coatings, in pounds or tons.

2. The permit to install for this emissions unit K004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Triethylamine

TLV (mg/m3): 0.0988 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 0.48 lb/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.16 ug/m3

MAGLC (ug/m3): 98.81 ug/m3

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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. 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 annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall also submit an annual report that specify the total VOC emissions from this emissions unit for the previous calendar year. The report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

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

   a. Emission Limitation-
   The VOC emissions from this emissions unit shall not exceed 2.6 lbs/hr.

   Applicable Compliance Method-
   Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

Emissions Unit ID: **K004**

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25,or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation -
The VOC emission rate from this emissions unit shall not exceed 11.39 tons/yr.

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

c. Emission Limitation-
The VOC content of the coatings shall not exceed 3.0 pounds VOC per 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. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, 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.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

F. Miscellaneous Requirements

1. Terms in this permit for emissions unit K004 supercede those identified in PTI 08-3631 issued 01/03/1997 and represent a 5.89 tons increase in the annual VOC allowable emissions rate.