



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION MONTGOMERY COUNTY

CERTIFIED MAIL

Application No: 08-03716

DATE: 2/13/2003

Mutual Tool and Die Inc
Jacqueline Burrows
725 Lilac Ave
Dayton, OH 454273000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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, 43266-0149.

A Permit to Install modification 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 modification a fee of \$ 0 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.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA RAPCA Miami Valley Regional Planning Commission KY IN



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 08-03716

Application Number: 08-03716
APS Premise Number: 0857043048
Permit Fee: **To be entered upon final issuance**
Name of Facility: Mutual Tool and Die Inc
Person to Contact: Jacqueline Burrows
Address: 725 Lilac Ave
Dayton, OH 454273000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1421 S Broadway St
Dayton, Ohio**

Description of proposed emissions unit(s):
administrative modification to combine P001, prep area etching and K001, spray paint booth under one unit number.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Mutual Tool and Die Inc
PTI Application: 08-03716

Facility ID: 0857043048

Issued: To be entered upon final issuance

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

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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

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lead to such sanctions

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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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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>
VOC	24.65

**Mutu:
PTI A**

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint Booth; prep area etching and coating misc. metal parts	OAC rule 3745-31-05(A)(3)	<p>169.8 lbs/day and 13.24 tons/yr organic compounds (from all materials used in prep area)</p> <p>58.88 lbs/day excluding cleanup and 11.41 tons/yr including cleanup of volatile organic compounds (VOC) (from all the coatings used for misc. metal parts coating)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i).</p> <p>The maximum daily coating usage rate shall not exceed 8 gallons.</p> <p>(from all the coatings used for misc. metal parts coating)</p>
	OAC rule 3745-21-09(U)(2)(e)(i)	

2. Additional Terms and Conditions

- 2.a The 169.8 lbs OC/day emission limitation was established for PTI purposes to reflect the

Mutu:

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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.

**Mutu:
PTI A**

Emissions Unit ID: **K001**

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- 2.b** The 58.88 lbs VOC/day 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

none

C. Monitoring and/or Recordkeeping Requirements

- a. The permittee shall collect and record the following information each day when coating misc. metals parts:
- a. The name and identification number of each coating employed.
- b. The volume, in gallons, of each coating employed.
- c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions from prepping:
- a. The name and identification number of each material employed
 - b. The number of gallons of each material employed.
 - c. The OC content of each material employed, in pounds per gallon.
 - d. The total OC emissions from all the materials employed in pounds.
3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions from coating of misc. parts:
- a. The name and identification number of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all coating and cleanup materials employed, in pounds.

4. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 1 Methoxy, 2 Propanol

TLV (mg/m³): 368.59

Maximum Hourly Emission Rate (lbs/hr): 15.65

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 603.78

MAGLC (ug/m³): 8,775.93

Pollutant: n-Butanol

TLV (mg/m³): 60.63

Maximum Hourly Emission Rate (lbs/hr): 11.76

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 453.7

MAGLC (ug/m³): 1444

Pollutant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 12.18

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 469.90

Mutu:**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

MAGLC (ug/m3): 10,337.9

Pollutant: MIAK

TLV (mg/m3): 233.54

Maximum Hourly Emission Rate (lbs/hr): 20.84

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 804

MAGLC (ug/m3): 5560.42

Pollutant: IPA

TLV (mg/m3): 938.07

Maximum Hourly Emission Rate (lbs/hr): 47.95

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,849.91

MAGLC (ug/m3): 23,406.37

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled.
- b. Changes in the composition of the materials, or use of new materials, that would result in

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PTI A**

Emissions Unit ID: **K001**

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an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled.

- 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limitation of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the exceedance occurs.
- 2. The permittee shall submit annual reports that specify the total OC emissions from prepping and the total VOC emissions from coating metals from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Compliance Method

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

Prep Area:

- a. Emission Limitation -
169.8 lbs OC/day

Applicable Compliance Method -
Compliance may be determined by multiplying the maximum hourly material usage rate (gallons/hr) by the maximum OC content of all the materials employed (lbs OC/gallon).

- b. Emission Limitation -
13.24 tons OC/yr

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the 12 monthly OC emission rates, divided by 2000.

Mutu:**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

Miscellaneous Metal Parts:

- c. Emission Limitation -
58.88 lbs VOC/day

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs VOC/gallon of coating).

- d. Emission Limitation -
11.41 tons VOC/yr, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit and shall be the summation of the 12 monthly VOC emission rates, divided by 2000.

- e. Emission Limitation -
The maximum daily coating usage rate shall not exceed 8 gallons.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

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

F. Miscellaneous Requirements

none