



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: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
MONTGOMERY COUNTY
Application No: 08-02013

DATE: 6/19/2003

Lord Corp
Robert Fortner
4644 Wadsworth Rd
Dayton, OH 454144294

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

A handwritten signature in cursive script that reads "Michael W. Ahern".

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

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 6/19/2003
Effective Date: 6/19/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-02013

Application Number: **08-02013**
APS Premise Number: **0857731802**
Permit Fee: **\$300**
Name of Facility: **Lord Corp**
Person to Contact: **Robert Fortner**
Address: **4644 Wadsworth Rd
Dayton, OH 454144294**

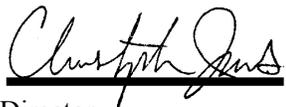
Location of proposed air contaminant source(s) [emissions unit(s)]:
**4644 Wadsworth Rd
Dayton, OHIO**

Description of modification:
administrative modification to remove units K001 and K002 currently issued as 08-03460 on 1-31-96 and P002 currently issued as 08-03446 on 12-13-95.

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

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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 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).

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.

SOURCE OPERATION 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 and regulations.

ord Corp

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Lord Corp** located in **MONTGOMERY** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

specified allowable
 emission rates

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
B001	T4.1 x 10 ⁶ BTU/hr Natural Gas-Fired Process Boiler	Compliance with the specified allowable emission rates; Use of Natural Gas Only
K003	Assembly Spray Booth and Oven	Compliance with the specified allowable emission rates; Recordkeeping /Reporting; R&D Requirement;
P003	Hand-Cranked Mixer and Dispensing Pump (Churnhouse)	Improved Transfer eff. Technology
P004	Elastomer Preheating Ovens and Curing Presses (4 each)	Compliance with the specified allowable emission rates; Recordkeeping/Reporting
		Compliance with the

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	<u>BAT Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
Applicable Federal & <u>OAC Rules</u>	3745-31-05 3745-21-07 (G) (2)	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>	0.020 lb/10 ⁶ BTU 0.36 TPY PM	
	3745-31-05 3745-17-10n (B)			22.0 lbs/Day and 1.12 TPY OC (including clean-up) less than or equal to 3 gallons/day coating usage
	3745-31-05 3745-21-09 (U)(2)(e))			1.3 lb/hr, 2.5 lbs/Day, and 0.32 TPY OC
				1.0 lb/hr, 16 lbs/Day, and 2.1 TPY OC
	3745-31-05 3745-21-07 (G)(2)			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	0.36
OC	16.52
Nitric & Chromic Acid Mists	0.52

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **RAPCA**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Churnhouse (P003)
 - a. This facility shall maintain monthly records which list the following information for each surface coating and/or adhesive employed in each of these sources:
 - (1) the company identification of the surface coating;
 - (2) the number of gallons employed;
 - (3) the volatile organic compound (VOC) content, in percent by volume;
 - (4) the solids content, in percent by volume;
 - (5) the water content, in percent by volume;
 - (6) the density of the volatile organic solvents pounds per gallon.
 - b. This facility shall also maintain monthly records which list the following information for each cleanup material employed in each of these sources:
 - (1) the company identification of the cleanup material;
 - (2) the number of gallons employed;
 - (3) the density of the cleanup material, pounds per gallon.

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- c. This facility shall maintain monthly records of the number of days each source (P003) was in operation.

- d. This facility shall submit semi-annual reports to the Regional Air Pollution Control Agency which summarize the information required above. The reports shall be submitted by January 15 and July of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

2. Elastomer Preheating ovens and Curing Presses (P004)
 - a. This facility shall maintain monthly records which list the following information for this source:
 - (1) the amount of elastomer pellets employed, in pounds; and,
 - (2) the volatile organic compound (VOC) content, in percent by weight.
 - b. This facility shall maintain monthly records of the number of days the source (P004) was in operation.
3. Adhesives currently employed at this facility are identified as E-722 adhesive primer (6.13 lbs VOC/gal), E-720 adhesive (6.80 lbs VOC/gal), and E-828 adhesive (6.80 lbs VOC/gal).

This facility shall pursue the adhesive reformulation program currently in place to develop adhesives that are lower in VOC content. Annual reports which document this on-going research and development shall be submitted to RAPCA. The reports shall contain at a minimum, letters outlining current efforts, results of any trial adhesive application, and any projected use of alternative adhesives. Upon successful trial of new adhesives, this facility shall begin to utilize the lower VOC content adhesives.
4. In any event, the VOC content of the coatings utilized in these sources shall not exceed that level indicated above.

For Assembly Spray Booth K003

5. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and,
 - c. the total volume, in gallons, of all of the coatings employed.
6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup materials, in pounds per gallon;

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- d. the VOC content of each coating, as applied, in pounds per gallon; and,
 - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
7. The permittee shall notify the Director (Regional Air Pollution Control Agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Regional Air Pollution Control Agency) within 45 days after the exceedance occurs.