



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

11/20/97

CERTIFIED MAIL

06-40-02-0012

RE: Final Chapter 3745-35 Permit To Operate

Frick-Gallagher Manufacturing
Charles Little
201 South Michigan Avenue
Wellston, OH 45692

Dear Charles Little:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (614) 385-8501.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 11/20/97

Facility ID: 06-40-02-0012

Expiration Date: 11/20/00

FINAL ISSUE

This document constitutes issuance for: Frick-Gallagher Manufacturing
201 South Michigan Avenue
Wellston, OH 45692

of a permit to operate for:

K001 (Paint Line #1)
Paint Line #1

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

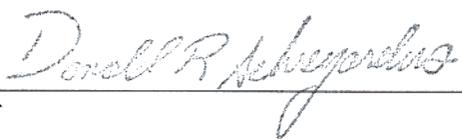
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(614) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|---|---|--|
| Paint Line #1 (K001) | OAC 3745-35-07 | 48.0 tons of VOC per rolling 12-month period. |

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The maximum monthly usage of coatings and thinners (formulated as specified in the permit application) shall not exceed 2496 gallons. The maximum monthly usage of cleanup material (xylene) shall not exceed 10 gallons .
2. The coatings and thinners employed in this emissions unit shall not contain any hazardous air pollutants (HAPs) , as identified in Section 112 (b) of Title III of the Clean Air Act.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month .
 - 1.a The name and identification number of each coating, thinnner, and cleanup material employed.
 - 1.b The VOC content and HAP content of each coating, thinner, and cleanup material , in pounds per gallon.
 - 1.c The number of gallons of each coating, thinner, and cleanup material employed during the month.
 - 1.d The total number of gallons of coatings and thinners.
 - 1.e The total number of gallons of cleanup material.
 - 1.f The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons, for the month and the rolling, 12-month summation of VOC emissions from all coatings, thinners, and cleanup material employed, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Ohio EPA Southeast District Office by January 31, April 30, July 31, and October 31 respectively, of any deviation (excursions) of the monthly coatings / thinners usage limitation, the monthly cleanup material usage limitation, and the rolling 12-month VOC emission limitation. The quarterly reports also shall identify the use of any coatings and/or thinners that contain one or more HAPs.
2. The permittee shall also submit annual reports to the Ohio EPA Southeast District Office by Febuary 15 of each year , which includes the following information :
 - 2.a The total VOC emissions from the coatings, thinners, and cleanup material employed , in tons, for each month and each rolling, 12-month period.
 - 2.b The total gallons of coatings and thinners and total gallons of cleanup material used for each month .

2 Facility Name: Frick-Gallagher Manufacturing
2 Facility ID: 06-40-02-0012
2 Emissions Unit: Paint Line #1 (K001)

E. Testing Requirements

1. Compliance with the rolling, 12-month emission limitation in Section A of this permit shall be determined in accordance with the following :
Monthly records shall be maintained of coating, thinners, and cleanup material usages as required in Section C of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings, thinners, and cleanup material. The VOC emission rate for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of the material employed by the appropriate VOC content determined for that material. The VOC emission rate for each month shall be calculated by adding all of the VOC emissions from all of the coatings, thinners, and cleanup material employed during that time. The rolling 12-month summations for VOC shall be calculated each month by adding the VOC emissions for that month to the VOC emissions from the previous 11 calendar months.

The HAP content of each coating, thinner, and cleanup material shall be determined from formulation data.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions in this permit are federally enforceable.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date 11/20/97

Facility ID: 06-40-02-0012

Expiration Date: 1/20/00

FINAL ISSUE

This document constitutes issuance for:

Frick-Gallagher Manufacturing
201 South Michigan Avenue
Wellston, OH 45692

of a permit to operate for:

K002 (Paint Line #3)
Paint Line #3

PART I General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(614) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|---|---|--|
| Paint Line #3 (K002) | OAC 3745-35-07 | 50.0 tons of VOC per rolling 12-month period. |

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The maximum monthly usage of coatings and thinners (formulated as specified in the permit application) shall not exceed 1536 gallons. The maximum monthly usage of cleanup material (xylene) shall not exceed 10 gallons.
2. The coatings and thinners employed in this emissions unit shall not contain any hazardous air pollutants (HAPs) , as identified in Section 112 (b) of Title III of the Clean Air Act.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month .
 - 1.a The name and identification number of each coating, thinnner, and cleanup material employed.
 - 1.b The VOC content and HAP content of each coating, thinner, and cleanup material ,in pounds per gallon.
 - 1.c The number of gallons of each coating, thinner, and cleanup material employed during the month
 - 1.d The total number of gallons of coatings and thinners.
 - 1.e The total number of gallons of cleanup material
 - 1.f The total VOC emissions from all coatings, thinners, and cleanup materials employed in pounds or tons for the month and the rolling, 12-month summation of VOC emissions from all coatings, thinners, and cleanup material employed, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Ohio EPA Southeast District Office by January 31, April 30, July 31, and October 31 respectively, of any deviation (excursions) of the monthly coatings / thinners usage limitation, the monthly cleanup material usage limitation, and the rolling 12-month VOC emission limitation. The quarterly reports also shall identify the use of any coatings and/or thinners that contain one or more HAPs.
2. The permittee shall also submit annual reports to the Ohio EPA Southeast District Office by Febuary 15 of each year , which includes the following information :
 - 2.a The total VOC emissions from the coatings, thinners, and cleanup materials employed , in tons, for each month, and each rolling 12-month period and annual total.
 - 2.b The total gallons of coatings and thinners and total gallons of cleanup material used for each month .

2 Facility Name: Frick-Gallagher Manufacturing
2 Facility ID: 06-40-02-0012
2 Emissions Unit: Paint Line #3 (K002)

E. Testing Requirements

1. Compliance with the rolling, 12-month emission limitation in Section A of this permit shall be determined in accordance with the following :
Monthly records shall be maintained of coating, thinners, and cleanup material usages as required in Section C of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings, thinners, and cleanup material. The VOC emission rate for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of the material employed by the appropriate VOC content determined for that material. The VOC emission rate for each month shall be calculated by adding all of the VOC emissions from all of the coatings, thinners, and cleanup material employed during that time. The rolling 12-month summations for VOC shall be calculated each month by adding the VOC emissions for that month to the VOC emissions from the previous 11 calendar months.

The HAP content of each coating, thinner, and cleanup material shall be determined from formulation data.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions in this permit are federally enforceable.