



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
PREBLE COUNTY
Application No: 08-03727

DATE: 3/29/2001

Neaton Auto Products Mfg Inc
Buddy McDaniel
975 S Franklin St
Eaton, OH 453200000

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 3/29/2001
Effective Date: 3/29/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03727

Application Number: **08-03727**
APS Premise Number: **0868030155**
Permit Fee: **\$100**
Name of Facility: **Neaton Auto Products Mfg Inc McDaniel**
Person to Contact: **Buddy McDaniel**
Address: **975 S Franklin St
Eaton, OH 453200000**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**975 S Franklin St
Eaton, OHIO**

Description of modification:
administrative modification of two paint spray booths, K016 and K017.

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

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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 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.

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.

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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.

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Neaton Auto Products Mfg Inc** located in **PREBLE** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K016	IP paint system with 1 infrared oven & 1 gas-fired cure oven		3745-31-05(A)(3) 3745-21-07(G)	1.85 lbs/hr OC, excluding cleanup, 41.6 lbs/day, 5.92 TPY OC, including cleanup
K017	IP touch-up booth		3745-31-05(A)(3) 3745-21-07(G)	5.71 lbs/hr OC, excluding cleanup, 40.0 lbs/day, 7.3 TPY OC, including cleanup

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	
Organic Compounds	SO ₂
Natural Gas Combustion Engines:	NO _x
PM	CO
	OC

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Tons/Year

13.22

0.102

0.0051

0.85

0.18

0.068

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Source

Pollutant(s)

K016

OC

RECORD(S) RETENTION AND AVAILABILITY

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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 Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Potential to Emit

1. The pound/hour allowable emission rates were established for PTI purposes to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. OC Content Requirements

1. The organic content (OC) of the coating(s) and cleanup material employed in emission units K016 and K017 shall not exceed 5.71 pounds of OC per gallon of coating, as applied and 7.47 pounds of OC per gallon of cleanup.
2. The coatings and cleanup solvent employed in this emissions unit shall not be a photochemically reactive material as defined by OAC Rule 3745-21-01(C)(5).

C. Coating Material Usage Limitations

1. The permittee shall not exceed the following usage limitations:

K016

<u>Material</u>	<u>gal/hour</u>	<u>gal/day</u>	<u>gal/year</u>
Coating	6.49	130.0	35,719.0
Cleanup	-----	12.0	4,380.0

K017

<u>Material</u>	<u>gal/hour</u>	<u>gal/day</u>	<u>gal/year</u>
Coating	1.0	6.35	2,319.0
Cleanup	-----	0.5	182.5

D. Record keeping

1. The permittee shall collect and record the following information each day for emission unit **K016** and maintain the information at the facility for a period of 5 years:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled organic compound emission rate for all coatings and cleanup materials, in pounds per day; and,
 - e. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

2. The permittee shall collect and record the following information each day for emission unit **K017**

and maintain the information at the facility for a period of 5 years:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallons; and,
- d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day.

E. Emission/Control Requirements

1. The organic compounds emissions from the IP Paint System, identified as emission unit K016, shall be controlled through the application of a common regenerative thermal oxidizer (RTO), operating at a destruction efficiency of at least 95 percent.

The common RTO associated with K016 is shared with emission unit K013 (PTI #08-3153).

The aggregate organic compound emissions from the common RTO, including those from emission unit K013, shall not exceed the following: 2.85 pounds/hour, 57.2 pounds/day, and 7.94 TPY organic compounds.

F. Organic Compound Capture Efficiency; Permanent Total Enclosure

1. Emission unit K016 (IP Paint System) and the cure oven associated with this emission unit shall meet the following criteria for "permanent total enclosure" (PTE):
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hour (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the

process; and,

- e. all OC emissions must be captured and contained for discharge through a control device.

By satisfying the criteria above for establishing permanent total enclosure, the total organic compound capture efficiency shall be assumed to be 100 percent.

G. Thermal Incinerator Temperature Monitoring & Operational Requirements

1. The permittee shall control the OC emissions from this emissions unit by a regenerative thermal oxidizer operating at a destruction efficiency of at least 95 percent at all times during operation.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

H. Permanent Total Enclosure Monitoring Requirements

1. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and,
 - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

I. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, for each emission unit, K016 and K017, which includes:
 - a. an identification of each day during which the organic compound emission rate exceeded the pounds per day allowable emission rate, and the actual organic compound emission rate for each such day; and,
 - b. an identification of each day during which the daily coating usage exceeded the allowable usage rate.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure determined from the latest performance test where the emissions unit showed compliance.
3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. The permittee shall submit required reports in the following manner:

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- a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control Agency; and,
- 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 record keeping 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 Regional Air Pollution Control 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.)

J. Toxic Review

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 08-03727. In conjunction with the best available technology requirements of OAC Rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Organic Compounds

TLV ($\mu\text{g}/\text{m}^3$): 188 (TLV for toluene - worst-case)

Maximum Hourly Emission Rate (pounds/hour): 4.7 (uncontrolled)

**Predicted 1 Hour Maximum Ground-Level Concentration at
the Fenceline ($\mu\text{g}/\text{m}^3$): 1555**

**Maximum Acceptable Ground Level Concentration (MAGLC)
($\mu\text{g}/\text{m}^3$): 1880**

Any of the following changes may be deemed "modification" to the emissions unit and, as such, prior notification to and approval from the Regional Air Pollution Control Agency is required, including the possible issuance of modifications to PTI number 08-03727 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new

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coatings or cleanup 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 specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. a reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;
- d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC Rule 3745-31-01; and,
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC Rule 3745-77-01(V).

K. Compliance Determination

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

- a. **Emission Unit K016**

- i. Emission Limitation

1.85 pounds/hour OC, excluding cleanup

- Applicable Compliance Method

Compliance shall be determined by multiplying the respective maximum hourly coating usage of 6.49 gallons times the maximum organic compound content of 5.7 pounds OC/gallon. The result is then multiplied by the minimum destruction efficiency of 95 percent (1-0.95).

ii. Emission Limitation

41.6 pounds/day OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon the record keeping required in Additional Special Term and Condition B.2.

iii. Emission Limitation

5.92 TPY OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon the record keeping required in Additional Special Term and Condition B.2. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.

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b. **Emission Unit K017**

i. Emission Limitation

5.71 pounds/hour OC, excluding cleanup

Applicable Compliance Method

Compliance shall be determined by multiplying the respective maximum hourly coating usage of 1.0 gallon times the maximum organic compound content of 5.71 pounds OC/gallon.

ii. Emission Limitation

40.0 pounds/day OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon the record keeping required in Additional Special Term and Condition C.1.

iii. Emission Limitation

7.30 TPY OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon the record keeping required in Additional Special Term and Condition C.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.

iv. Organic Content Limitation

Coating	5.71 pounds OC/gallon
Cleanup	7.47 pounds OC/gallon

Applicable Compliance Method

Formulation data or USEPA Method 24 shall be used to determine the organic

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compound content of the coatings and cleanup materials.