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Facility Name: **ITT Automotive Inc**

Application Number: **03-3079**

Date: **March 3, 1999**

**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

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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.

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### **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**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; 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 **ITT Automotive Inc** located in **Fulton** 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.

and conditions of this permit

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>
K011	Miscellaneous Metal Coating Line w/ catalytic incinerator  (Procoat 2000 Line D)	Use of catalytic incinerator and compliance with the "Air Toxics Policy" and the terms & conditions of this permit	3745-31-05
			3745-21-09 (U) (1) (c)
P801	Facility Cleaning solvent Usage	Use of non-photochemically reactive materials (PRM), compliance with the "Air Toxics Policy" and the terms	3745-31-05  3745-21-07 (G)



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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	9.4

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

**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

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reported immediately to the **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

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**

##### **Introduction**

This Permit to Install (PTI) is to allow for the installation of a new flow coating operation identified by the permittee as Procoat 2000 Line D. This PTI will also establish emission limits for facility cleaning solvent usage.

##### **A. Applicable Emissions Limitations and/or Control Requirements**

1. VOC emissions from Procoat 2000 Line D, OEPA emissions unit K011 respectively, shall be vented to an incinerator control system that has a capture efficiency of 100 percent (permanent total enclosure) and, at a minimum, a destruction efficiency of 95 percent, by weight (95% overall control efficiency).

##### **B. Operational Restrictions**

1. The permittee shall not employ cleanup materials that would be classified as a "photochemically reactive

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material", as defined by OAC rule 3745-21-01, in emissions unit P801.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated emissions unit K011 was in compliance, whenever this emissions unit was in operation.
3. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the maximum annual emissions for each toxic compound will be less than 1.0 ton for all the emissions units contained within this permit. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. 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

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devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall collect and record the following information each day for emissions unit K011 and the associated control equipment:
  - a. the name and identification for each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, and, if using a daily volume-weighted average to demonstrate compliance, the volume solids content, in percent, as applied, and the volume, in number of gallons, as applied, for each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance;
  - e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
  - f. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the

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- exhaust gasses during the most recent emissions test that demonstrated that the emissions unit was in compliance;
- g. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the temperature as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance; and,
  - h. the difference in pressure between the permanent total enclosure and the surrounding area(s).
4. The permittee shall collect and record the following information each month for emissions unit K011:
- a. the name and identification for each coating and makeup solvent employed;
  - b. the VOC content of each coating and makeup solvent employed, in pounds per gallon;
  - c. the number of gallons of each coating and makeup solvent employed;
  - d. the total uncontrolled VOC emission rate for all coatings and makeup solvents, in pounds or tons per month;
  - e. the calculated, controlled VOC emission rate, in pounds or tons of VOC per month (VOC content multiplied by the number of gallons employed multiplied by the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance); and,
  - f. the annual, year-to-date VOC emissions.
5. The permittee shall collect and record the following information each month for P801:

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- a. the name and identification of each flush solvent or cleanup material employed;
  - b. the number of gallons of each flush solvent or cleanup material employed;
  - c. the VOC content of each flush solvent or cleanup material, in pounds per gallon;
  - d. the calculated VOC emissions rate from each flush solvent or cleanup material, in pounds;
  - e. the calculated VOC emissions rate from all flush solvents & cleanup materials, in pounds or tons; and,
  - f. the annual, year-to-date VOC emissions associated with the use of flush solvents and cleanup materials.
6. 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 strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

Note: For the purposes of this permit, facility cleaning solvent usage (emissions unit P801) includes all solvent used for line flushing and misc cleaning of the coating lines or other small parts and process equipment. It does not include solvent used in any cold cleaning tanks or any makeup solvents added to the coatings.

**D. Reporting requirements**

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1. The permittee shall notify the Director (Ohio EPA Northwest District Office) of any daily record showing the calculated controlled VOC emissions rate exceeds the applicable pounds of VOC per gallon of solids limitation for emissions unit K011. A copy of such record and shall be sent to the Director (Ohio EPA Northwest District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.
4. 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 specified above.
5. Except as provided in condition D.1.above, quarterly written reports of (a) any deviations (excursions) from

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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 Ohio EPA, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

6. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C) (5).
  
7. The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

**E. Testing Requirements Compliance Method Determinations**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. emission testing shall be conducted within 180 days after the issuance of this permit;
  - b. emissions testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC, and the mass emission rate for VOC;
  - c. method 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates for VOC;

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- d. the test methods which must be employed to demonstrate compliance with the capture and control efficiency limitation for volatile organic compounds, are specified below:
  - i. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement;

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- ii. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The company shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method;
- f. the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office;
- g. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of

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the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept the results of the emission test(s);

- h. personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment;.
  - i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office; and,
  - j. as part of the stack test submittal, the permittee shall submit a letter identifying the following:
    - i. the overall control efficiency for the control system (capture times destruction);
    - ii. the average temperature of the process vent stream immediately before the catalyst bed;
    - iii. the average temperature of the process vent stream immediately after the catalyst bed; and,
    - iv. the average temperature difference across the catalyst bed.
2. Compliance with the emission limitations/usage restrictions of this permit shall be determined in accordance with the following methods:

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a.	<b>Emissions Unit</b>	<b>Emissions Limitation</b>
	K011	0.82 lbs VOC/hr

Applicable Compliance Method:

Performance testing, as specified in condition E.1. above.

b.	<b>Emissions Unit</b>	<b>Emission Limitation</b>
	K011	3.6 tons VOC/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C above.

c.	<b>Emissions Unit</b>	<b>Emission Limitation</b>
	K011	6.7 lbs VOC/gallon of solids

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C above.

d.	<b>Emissions Unit</b>	<b>Emission Limitation</b>
	P801	960 lbs VOC/month & 5.8 tons VOC/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C above.

**F. Miscellaneous Requirements**

1. None.