Facility Name: **Lippert Components, Inc**
Application Number: **03-3084**
Date: **Draft PTI (Date will be entered upon final issuance)**

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

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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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Lippert Components, Inc** located in **Williams** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K001	Spray Coating Operation for Steel Parts for RV Chassis	Compliance with the Terms and Conditions of this Permit, and compliance with the "Air Toxics Policy"	3745-31-05 3745-21-09 (U)(1)(i)	3745-17-11 (B)(2) 3745-17-07

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	, as a six minute average			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents			
9.9 ton/yr HAPs, per rolling 12-month period	See Additional Special Terms and Condition (A)(4) *			
9.45 lb/hr, 41.4 ton/yr OC				
0.67 lb/hr, 2.93 ton/yr particulate emissions (PE)				
0% opacity				

Facility Name: **Lippert Components, Inc**
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* The emission limit based on this applicable rule is less stringent than the limit established pursuant to OAC 3745-31-05.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
OC	41.4
PE	2.93
HAP	9.9

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 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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction:

This Permit to Install (PTI) is for a new spray coating operation for steel parts for recreational vehicle chassis.

A. Applicable Emission Limitations and/or Control Requirements

1. The HAP emissions from emissions unit K001 shall be not more than 9.9 tons/year for any individual hazardous air pollutant (HAP) *, based upon a rolling 12-month summation of the monthly HAP emissions.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emissions limits specified in the following table, from emissions unit K001:

Maximum Allowable Cumulative Emissions Limits

Month(s)	Individual HAP
1	4.5
1-2	5.0
1-3	5.5
1-4	6.0
1-5	6.5
1-6	7.0
1-7	7.5
1-8	8.0
1-9	8.5
1-10	9.0
1-11	9.5
1-12	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

* Note: Ethylene glycol ethers, as a group, are considered an individual HAP.

3. The organic compound (OC) limitation of 9.45 lb/hr reflects 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 limit.

4. Note: The uncontrolled mass rate of emissions (UMRE) of this emissions unit is less than 10 pounds per hour, and the emissions unit is located in Williams County. Therefore, no emission limitation is established under OAC 3745-17-11.

B. Operational Restrictions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: **ethylene glycol ethers**

   TLV (ug/m3): **121,000**

   Maximum Hourly Emission Rate (lbs/hr): **5.8**

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **637.0**

   MAGLC (ug/m3): **2881.0**

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process <u>may</u> be determined to be a "modification":

   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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. 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.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. <u>prior to the change</u>, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the

application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall not employ cleanup materials which contain organic compounds or hazardous air pollutants in this emissions unit.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. <u>Monitoring and Recordkeeping Requirements</u>

1. The permittee shall collect and record the following information each month:

   a. the name and identification number of each coating, as applied;

   b. the individual Hazardous Air Pollutant (HAP)[1] content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

   c. the total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

   d. the number of gallons of each coating employed;

   e. the total individual HAP emissions for each HAP from all coatings employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f time h for each cleanup material); and,

   f. the total combined Hazardous Air Pollutant (HAP) emissions from all coatings employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each

coating plus the sum of g times h for each cleanup material).

[1]A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

* Note: Ethylene glycol ethers, as a group, are considered an individual HAP.

2. The permittee shall collect and record the following information each month for emissions unit K001:

   a. the name and identification number of each coating employed;

   b. the volume, in gallons, of each coating employed;

   c. the OC content of each coating, in pounds per gallon as applied;

   d. the OC input rate from each coating, in pounds [(b) times (c)];

   e. the total OC input rates from all coatings, in tons [sum (d)]; and,

   f. the VOC content of each coating (excluding water and exempt solvents), as applied.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed

(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

5. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days after the event occurs.

3. The permittee shall notify the Director of any monthly record showing any deviation from the following:

   a. the total individual HAP emissions limitation for each HAP from all coatings employed, in pounds or tons per month and pounds or tons per rolling 12 month period;

   b. the total combined HAP emissions limitation from all coatings employed, in pounds or tons per month and pounds or tons per rolling 12 month period; and,

c. exceedances of the rolling 12 month, input rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC input rate.

4. Quarterly written reports of 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, the probable cause of such deviations, and 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. 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.)

E. Testing Requirements/ Compliance Method Determinations

1. Emission Limitation:
0.67 lb/hr particulate emissions (PE), 2.93 ton/yr

Applicable Compliance Method:
To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (39% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 90%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR 60, Appendix A, Method 5.

2. Emission Limitation:
0% opacity, as a six-minute average

Applicable Compliance Method:
40 CFR 60, Appendix A, Method 9

3. Emission Limitation:
41.4 ton/yr OC from coating operations
9.9 ton/yr HAPs *, per rolling 12-month period
3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The record keeping requirements in Section C of this permit shall be used to determine compliance with the above limits.

Any determination of VOC/OC content, HAP content, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coatings/cleanup materials by

formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC/OC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

* Note: Ethylene glycol ethers, as a group, are considered an individual HAP.

F. Miscellaneous Requirements

none