



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

09/16/97

CERTIFIED MAIL

13-18-17-3445

RE: Final Chapter 3745-35 Permit To Operate

North American Manufacturing Company
Robert Scanlon
4455 E 71st St
Cuyahoga Heights, OH 44105-5600

Dear Robert Scanlon:

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 Cleveland Division of Air Pollution Control at (216) 664-2324.

Very truly yours,

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

cc: Cleveland Division of Air Pollution Control
Jim Orlemann, DAPC Engineering

Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/16/97

Facility ID: 13-18-17-3445

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for:

North American Manufacturing Company
4455 E 71st St
Cleveland, OH 44105

of a permit to operate for:

K001 (Pnt1)

Paint booth area for coating industrial blower housings and assorted other metal parts used in the manufacture of industrial burners. Two, side-by-side booths with filtered exhaust.

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:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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

A handwritten signature in black ink, reading "Donald R. Schlegel". The signature is written in a cursive style and is positioned above a horizontal line.

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 booth for miscellaneous metal parts, extreme performance coating	OAC 3745-21-09 (U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

The maximum annual toluene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons. This emission limit shall include toluene emitted from coatings and cleanup materials.

- 2.b The maximum annual xylene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons. This emission limit shall include xylene emitted from coatings and cleanup materials.
- 2.c The maximum annual combined HAPs usage (emissions) for emissions units K001 and K002 shall not exceed 24.8 tons. This emission limit shall include combined HAPs emitted from coatings and cleanup materials.

The maximum annual VOC usage (emissions) for emissions units K001 and K002 shall not exceed 95.0 tons. This emission limit shall include VOC emitted from coatings and cleanup materials.

B. Operational Restrictions

1. The maximum daily toluene usage (emissions) for emissions units K001 and K002 shall not exceed 54.2 pounds.
2. The maximum annual toluene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons.
3. The maximum daily xylene usage (emissions) for emissions units K001 and K002 shall not exceed 54.2 pounds.
4. The maximum annual xylene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons.
5. The maximum daily combined Hazardous Air Pollutants (HAPs) usage (emissions) for emissions units K001 and K002 shall not exceed 136 pounds.
6. The maximum annual combined HAPs usage (emissions) for emissions units K001 and K002 shall not exceed 24.8 tons.
7. The maximum daily VOC usage (emissions) for emissions units K001 and K002 shall not exceed 520.5 pounds.
8. The maximum annual VOC usage (emissions) for emissions units K001 and K002 shall not exceed 95.0 tons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information, on a daily basis, for emissions units K001 and K002.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

- 1.a The name and identification number of each coating, as applied.
- 1.b The VOC, toluene, xylene, and total combined HAPs content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon for each constituent.

2
2

Facility Name: North American Manufacturing Company
Facility ID: 13-18-17-3445
Emissions Unit: Pnt1 (K001)

C. Monitoring and/or Record Keeping Requirements (continued)

- 1.c The number of gallons (excluding water and exempt solvents) of each coating employed.
- 1.d The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all coatings employed, in pounds for each constituent.
- 1.e The name and identification of each cleanup material employed.
- 1.f The VOC, toluene, xylene, and total combined HAPs content of each cleanup material, in pounds per gallon for each constituent.
- 1.g The number of gallons of each cleanup material employed.
- 1.h The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all cleanup materials employed, in pounds for each constituent.
- 1.i The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all coatings and cleanup materials, in pounds for each constituent.

D. Reporting Requirements

- 1. The permittee shall notify the Director of any daily record showing the use of noncomplying coatings (i.e., coatings that do not comply with the VOC content limitation of 3.5 pounds per gallon, excluding water and exempt solvents). A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily usage (emission) limitations for toluene, xylene, total combined HAPs, and VOC.
- 3. The permittee shall submit annual reports that specify the emissions of toluene, xylene, total combined HAPs, and VOC for the preceding calendar year. The reports shall be submitted by February 15 of each year.

E. Testing Requirements

- 1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. The permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- 2. Formulation data shall be used to determine the toluene, xylene, and other HAPs contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

- 1. The federally enforceable sections of this permit consist of Sections A-F.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 9 / 16 / 97

Facility ID: 13-18-17-3445

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for:

North American Manufacturing Company
4455 E 71st St
Cleveland, OH 44105

of a permit to operate for:

K002 (Pnt2)

Paint booth area for coating industrial blower housings and assorted other metal parts used in the manufacture of industrial burners. Two, side-by-side booths with filtered exhaust.

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.

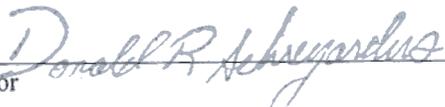
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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

pages.

8. The maximum annual VOC usage (emissions) for emissions units K001 and K002 shall not exceed 95.0 tons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the folk
K002

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 booth for miscellaneous metal parts, extreme performance coating	OAC 3745-21-09 (U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

The maximum annual toluene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons. This emission limit shall include toluene emitted from coatings and cleanup materials.

The maximum annual xylene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons. This emission limit shall include xylene emitted from coatings and cleanup materials.

- 2.c The maximum annual combined HAPs usage (emissions) for emissions units K001 and K002 shall not exceed 24.8 tons. This emission limit shall include combined HAPs emitted from coatings and cleanup materials.
- 2.d The maximum annual VOC usage (emissions) for emissions units K001 and K002 shall not exceed 95.0 tons. This emission limit shall include VOC emitted from coatings and cleanup materials.

B. Operational Restrictions

1. The maximum daily toluene usage (emissions) for emissions units K001 and K002 shall not exceed 54.2 pounds.
2. The maximum annual toluene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons
3. The maximum daily xylene usage (emissions) for emissions units K001 and K002 shall not exceed 54.2 pounds.
4. The maximum annual xylene usage (emissions) for emissions units K001 and K002 shall not exceed 9.9 tons.
5. The maximum daily combined Hazardous Air Pollutants (HAPs) usage (emissions) for emissions units K001 and K002 shall not exceed 136 pounds.
6. The maximum annual combined HAPs usage (emissions) for emissions units K001 and K002 shall not exceed 24.8 tons.
7. The maximum daily VOC usage (emissions) for emissions units K001 and K002 shall not exceed 520.5 pounds.
8. The maximum annual VOC usage (emissions) for emissions units K001 and K002 shall not exceed 95.0 tons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information, on a daily basis, for emissions units K001 and K002.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
 - 1.a The name and identification number of each coating, as applied.
 - 1.b The VOC, toluene, xylene, and total combined HAPs content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon for each constituent.

2
2

Facility Name: North American Manufacturing Company
Facility ID: 13-18-17-3445
Emissions Unit: Pnt2 (K002)

C. Monitoring and/or Record Keeping Requirements (continued)

- 1.c The number of gallons (excluding water and exempt solvents) of each coating employed.
- 1.d The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all coatings employed, in pounds for each constituent.
- 1.e The name and identification of each cleanup material employed.
- 1.f The VOC, toluene, xylene, and total combined HAPs content of each cleanup material, in pounds per gallon for each constituent.
- 1.g The number of gallons of each cleanup material employed.
- 1.h The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all cleanup materials employed, in pounds for each constituent.
- 1.i The total emissions (usage) of VOC, toluene, xylene, and total combined HAPs for all coatings and cleanup materials, in pounds for each constituent.

D. Reporting Requirements

- 1. The permittee shall notify the Director of any daily record showing the use of noncomplying coatings (i.e., coatings that do not comply with the VOC content limitation of 3.5 pounds per gallon, excluding water and exempt solvents). A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily usage (emission) limitations for toluene, xylene, total combined HAPs, and VOC.
- 3. The permittee shall submit annual reports that specify the emissions of toluene, xylene, total combined HAPs, and VOC for the preceding calendar year. The reports shall be submitted by February 15 of each year.

E. Testing Requirements

- 1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. The permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- 2. Formulation data shall be used to determine the toluene, xylene, and other HAPs contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

- 1. The federally enforceable sections of this permit consist of Sections A-F.