Facility Name: **Material Processing, Inc.**
Application Number: **03-3110**
Date: **February 18, 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

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.

Facility Name: **Material Processing, Inc.**
Application Number: **03-3110**
Date: **February 18, 1999**

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Application Number: **03-3110**
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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 **Material Processing, Inc.** located in **Wood** 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 |
|---|---|
| K001 | Brake Rotor Coating Line (2 booths and 1 bake oven) |

K001 cont'd

Facility Name: **Material Processing, Inc.**
Application Number: **03-3110**
Date: **February 18, 1999**

| Ohio EPA Source Number | Source Identification Number | BAT Determination | Applicable Federal & OAC Rules | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---|---|---|---|---|
| | | BAT Determination | | |
| | | Use of dry filtration system, compliance w/ Terms and Conditions in this permit and compliance w/ Ohio EPA "Air Toxics" policy | | |

Facility Name: **Material Processing, Inc.**
Application Number: **03-3110**
Date: **February 18, 1999**

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|---|---|---|---|---|
| | | | Permit Allowable Mass Emissions and/or Control/Usage Requirements | solvents for coating materials |
| | Applicable Federal & OAC Rules | 3745-17-11 (B)(1) | | (*) |
| | 3745-31-05 | 3745-17-07 (A)(1)-(3) | 10.0 lbs VOC/hr from application of coating materials | (*) |
| | | | 357.0 lbs VOC/month from application of cleanup materials | |
| | | | 26.14 tons VOC/year for all coatings and cleanup materials | |
| | | | 0.43 lb particulate emissions (PE)/hr, 1.04 tons PE/year | |
| | | | 0% opacity as a 6 minute average | |
| | 3745-21-09 (U)(1)(i) | | 3.0 lbs VOC/gallon excluding water and exempt | |

Facility Name: **Material Processing, Inc.**
Application Number: **03-3110**
Date: **February 18, 1999**

* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-31-05.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons/Year |
|---|---|
| VOC | 26.14 |
| PE | 1.04 |

**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 is for the new installation of a miscellaneous metal parts (brake rotor) coating line.

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

1. No additional emissions limitations and/or control requirements other than those listed in the Air Emissions Summary.

**B. Operational Restrictions**

1. This permit allows the use of the coating materials specified by the permittee in the PTI 03-13110 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on coating 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 SCREEN 3.0 model and a comparison of 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: Butyl Alcohol

   TLV (ug/m3): 303,000

   Maximum Hourly Emission Rate (lbs/hr): 10.0 (*)

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 340.7

   MAGLC (ug/m3): 7,210 ug/$m^3$

   * Note: These levels represent total VOC emissions. Butyl Alcohol represents the Air Toxic with the lowest TLV of all Air Toxics in the coating material.

   As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following

changes with prior notification to and approval from the Ohio EPA Northwest District Office:

a. any changes in the composition of the coating materials, or the use of new coating 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);

c. any change in the composition of the coatings or cleanup materials, or use of new coating materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V); and,

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];

For 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, the permittee shall obtain a permit to install prior to the change.

2. The permittee shall operate the dry filtration system on emissions unit K001 whenever emissions unit K001 is in operation.

**C. Monitoring and/or Recordkeeping Requirements**

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

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

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

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

   a. the VOC content of each coating employed, in pounds per gallon;

   b. the VOC content of each cleanup material employed, in pounds per gallon;

   c. the number of gallons of each coating employed;

   d. the number of gallons of each cleanup material employed;

   e. the VOC emissions from each coating employed, in pounds per month (axc);

   f. the total VOC emissions rate for all coatings (sum of e);

   g. the VOC emissions from each cleanup material employed, in pounds per month (bxd);

h. the total VOC emissions rate for all cleanup materials employed (sum of g); and,

i. the annual, year-to-date, VOC emission rate from all coatings/cleanup materials employed, (sum of f) for coatings and sum h for cleanup materials for each calendar month to date from January to December).

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

4. 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 in emissions unit K001. 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 submit quarterly written reports for emissions unit K001 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 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.)

4. The permittee shall also submit annual reports which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 1 of each year.

**E. Testing Requirements and/or Compliance Methods Determinations**

Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements and Air Emissions Summary of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

   10.0 lbs VOC/hr for all coating materials

   Applicable Compliance Method:

   The hourly VOC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

   *The potential to emit for this emissions unit was

based on a maximum VOC content of 3.0 lbs VOC/gallon and a maximum hourly usage rate of 3.33 gallons per hour.

2. Emission Limitation:

357.0 lbs VOC/month for all cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section C.2.

3. Emission Limitation

26.14 tons VOC/year for all coatings and cleanup materials

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section C.2.

4. Emission Limitation

3.0 lbs VOC/gallon excluding water and exempt solvents.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section C.1. of this permit. Formulation data or ISOPIA method 24 may be used to determine the VOC content of the coatings.

5. Emission Limitation:

0.43 lb/hr particulate emissions, 1.04 ton/yr

Applicable Compliance Method:

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

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

E = particulate matter emissions rate (lbs/hr)

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 98%)

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 part 60 Appendix A, Method 5.

6. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 9.

**F. Miscellaneous Requirements**

1. None