OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

RECEIVED - SWO AIR
POLLUTION CONTROL

SEP 25 1989

Richard F. Celeste
Governor

Re: Permit to Install
HAMILTON County
Application No. 14-16Ø1

CERTIFIED MAIL

SEPTEMBER 13, 1989

COATING SYSTEMS,
CURT GUNNARSON
15Ø SALES AVE
HARRISON, OH 45Ø3Ø

Dear Sir:

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.Ø4 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 Board of Review within thirty (3Ø) 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 and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 3ØØ
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 14-16Ø1
APS Premise No. 1431223344
Permit Fee: $1,19Ø.ØØ

Name of Facility: COATING SYSTEMS,

Person to Contact: CURT GUNNARSON

Address: 15Ø SALES AVE
HARRISON, OH 45Ø3Ø

Location of proposed source(s): 15Ø SALES AVE
HARRISON, OHIO

Description of proposed source(s): MISC METAL PARTS POWDER COATING LINE, TWO MISC METAL PARTS COATING LINES, PYROLYSIS FURNACE & O-RING COATING LINE.

Date of Issuance: SEPTEMBER 13, 1989

Effective Date: SEPTEMBER 13, 1989

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Richard L. Shank

Director

EPA 3156

Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve 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.

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, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

As specified in OAC Rule 3745-31-Ø5, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

The specified permit fee must be remitted within 15 days of the effective date of this permit to install.

If the construction of the proposed source has already begun or has been completed prior to the date the Director of the Ohio 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-Ø2. 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 prove to be inadequate or cannot meet applicable standards.

EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for COATING SYSTEMS located in HAMILTON County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table:

Ohio EPA Source #	Source Identification	BAT Determination	Applicable Ohio EPA Rule	Allowable Emissions (lb/hr, lb/MMBTU, gr/DSCF, etc.)
K001	Powder coating line	Use of 100% solids coating	3745-31-05 3745-17-11 3745-21-09	0.06 lb/hr Particulate

KØØ2	Misc. metal parts coating line (conventional line)	Limited coating & solvent usage & 6 gal/day coating limit	3745-31-Ø5 3745-21-Ø9	6.43 lb VOC/gallon as applied
KØØ3	Misc. metal parts coating line (dip spin line)	Limited coating & solvent usage & 6 gal/day coating limit	3745-31-Ø5 3745-21-Ø9	6.29 lb VOC/gallon as applied
RØØ1	O-ring coating line	The continued use of coatings w/ no volatile organic compounds	3745-31-Ø5 3745-21-Ø7	VOC = negligible
NØØ1	Pyrolysis furnace	Use of natural gas and after-burner	3745-31-Ø5 3745-17-Ø9 3745-17-Ø7	Ø.1 lb/part./1ØØ lb charge

SUMMARY
TOTAL NEW SOURCE EMISSIONS

Pollutant	Tons/Year
Particulate	1.81
VOC	5.25
SO_2	2.19
NO_x	2.63
CO	8.76
$PM_{1Ø}$	Ø.72

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

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.

REPORTING

Any reports required by the Permit to Install shall be submitted to SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY, 2400 Beekman Street, Cincinnati, OH 45214.

PERMIT TO OPERATE APPLICATION

A Permit to Operate Application and a $15 application fee must be submitted to the appropriate field office for each source in this Permit to Install. In accordance with OAC rule 3745-35-02, the application shall be made at least ninety days prior to start-up of the source.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Best Available Technology for the Powder Coating Line (K001) is the use of 100 percent solid coatings. Emissions from the Powder Coating Line are vented to a baghouse with a control efficiency of 98 percent.

   Best Available Technology for both miscellaneous Metal Parts Coating Lines (K002 and K003) is limited paint and solvent use (see usage/emissions limits).

   Best Available Technology for the O-Ring Coating Line (K004) is the use of waterborne coating with zero VOC content.

   Best Available Technology for the Burn-Off Oven (controlled pyrolysis furnace) is the installation of an afterburner fueled by natural gas. The afterburner (secondary combustion chamber) temperature should be maintained at 1400°F during operation.

2. Usage/Emission Limits:

Source	Usage	Emissions
K002	6 gals. of coating as applied per day, 154 gals. of coating as applied per year, 70 gals. of clean-up solvent per year.	6.43 pounds of VOC per gal. of coating as applied, 38.6 pounds of VOC per day, 0.65 tons of VOC per year
K003	6 gals. of coating per day, 518 gals. of coating as applied (including dilution solvent) per year, 406 gals. clean-up solvent per year	6.29 pounds of VOC per gal. of coating as applied, 37.7 pounds of VOC per day, 1.97 tons of VOC per year

NØØ1	4ØØ pounds of material per hour	Ø.Ø1 pounds of particulate per 1ØØ pound charge Visible emissions from this source shall not exceed 1Ø% opacity.

3. RØØ1 - coatings employed in this source shall contain no VOC in the solvents.

4. Solvent Recovery:

Coating Systems, Inc. shall continue to recover as much spent solvent and coating as possible. Collected material shall be sent to a reclaimer for proper handling.

4. Record-Keeping and Reporting Requirements:

This facility shall maintain daily records which list the following information for each surface coating employed in the miscellaneous metal parts lines (KØØ2 and KØØ3):

a. the company identification of each surface coating;
b. the number of gallons of each employed;
c. the VOC content, in pounds of VOC per gallon of coating as applied, including thinner;
d. the VOC content, in pounds of VOC per gallon of coating, excluding water;
e. the nonvolatile (solids) content, in percent by volume;
f. the company identification of each solvent employed;
g. the amount and type of dilution solvent employed;
h. the number of gallons of each employed for clean-up; and
i. the number of gallons of coating and spent solvents recycled.

These monthly records, as well as any supporting coating analyses and computations, shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

This facility shall submit quarterly reports to the Ohio EPA field office which summarize the following information for each coating employed in each of the above-mentioned sources during each of the previous three calendar months: the company identification of each surface coating, the total number of gallons employed, the VOC content (in pounds VOC per gallon excluding water), the water content and the nonvolatile (solids) content. These reports shall also contain the company identification of each solvent employed, the number of gallons of each employed as dilution solvent, the number of gallons used for clean-up for each coating line and also, summaries of the number of gallons of coating and clean-up solvent recycled. The reports shall be submitted by February 15, May 15, August 15 and November 15 of each year.