



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-02880

Fac ID: 1318597953

DATE: 3/29/2007

Tendon Manufacturing, Inc
Michael Gordon
20805 Aurora Road
Warrensville Hts, OH 44146

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA



Permit To Install
Terms and Conditions

Issue Date: 3/29/2007
Effective Date: 3/29/2007

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-02880

Application Number: 13-02880
Facility ID: 1318597953
Permit Fee: **\$0**
Name of Facility: Tendon Manufacturing, Inc
Person to Contact: Michael Gordon
Address: 20805 Aurora Road
Warrensville Hts, OH 44146

Location of proposed air contaminant source(s) [emissions unit(s)]:
20805 Aurora Road
Warrensville Hts., Ohio

Description of proposed emissions unit(s):
Misc Metal Parts Paint Spray Booths 1 and 2 --K001 and K002.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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 (i.e., postmarked) quarterly 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.)

3. 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 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 for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. 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

Tendon Manufacturing, Inc
PTI Application: 13-02880
Modification Issued: 3/29/2007

Facility ID: 131859795

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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

Tendon Manufacturing, Inc
PTI Application: 13-02880
Modification Issued: 3/29/2007

Facility ID: 131859795

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

Tendon Manufacturing, Inc
 PTI Application: 13-02880
 Modification Issued: 3/29/2007

Facility ID: 131859795

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.40

7

Tendon Manufacturing, Inc
PTI Application: 13-02880
Modification Issued: 3/29/2007

Facility ID: 131859795

Modification Issued: 3/29/2007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K001) - Paint Spray Booth 1:Modified

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 14.31 lbs/day from coatings and 2.70 tons per year (TPY) from coatings and clean up materials.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).</p>
OAC rule 3745-21-09 (U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. 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.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.

Modification Issued: 3/29/2007

- b. The VOC content of each coating employed, in pounds per gallon, as applied.
 - c. The number of gallons of each coating employed.
 - d. The total number of gallons of all the coatings employed.
 - e. The total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (b) times (c) for each coating employed].
3. The permittee shall collect and record the following information for each month for this emissions unit:
- a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of (b) times (c) for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
4. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in Section A.C.2 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section A.C.3].

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDAQ within 30 days after the event occurs.
2. The permittee shall notify the CDAQ in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3

Modification Issued: 3/29/2007

gallons per day. The notification shall include a copy of such record and shall be sent to the CDAQ within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify each day the VOC emissions exceeded the daily emissions limit specified above.

The quarterly deviation reports shall be submitted to the CDAQ in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
VOC emissions shall not exceed 14.31 lbs/day from coatings.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.
 - b. Emissions Limitation:
VOC emissions shall not exceed 2.70 TPY from coatings and clean up materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.4.
 - c. Emission Limitation:
Permittee shall not use more than 3 gal/day of coatings

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.
2. The permittee shall use U.S. EPA Method 24. 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, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the clean up materials.

F. Miscellaneous Requirements

None

Modification Issued: 3/29/2007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K002) - Paint Spray Booth 2: Modified

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	<p>Volatile Organic Compound (VOC) emissions shall not exceed 14.31 lbs/day from coatings and 2.70 tons per year (TPY) from coatings and clean up materials.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).</p>
OAC rule 3745-21-09 (U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. 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.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The VOC content of each coating employed, in pounds per gallon, as applied.

Modification Issued: 3/29/2007

- c. The number of gallons of each coating employed.
 - d. The total number of gallons of all the coatings employed.
 - e. The total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (b) times (c) for each coating employed].
3. The permittee shall collect and record the following information for each month for this emissions unit:
- a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of (b) times (c) for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
4. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in Section A.C.2 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section A.C.3].

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDAQ within 30 days after the event occurs.
2. The permittee shall notify the CDAQ in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent

Tendon Manufacturing, Inc

DTI Application: 12-02880

Facility ID: 131859795

Emissions Unit ID: K002

to the CDAQ within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify each day the VOC emissions exceeded the daily emissions limit specified above.

The quarterly deviation reports shall be submitted to the CDAQ in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

Modification Issued: 3/29/2007

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:
VOC emissions shall not exceed 14.31 lbs/day for coatings.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.

b. Emissions Limitation:
VOC emissions shall not exceed 2.70 TPY for coatings and clean up materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.4.

c. Emission Limitation:
Permittee shall not use more than 3 gal/day of coatings

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.

2. The permittee shall use U.S. EPA Method 24. 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, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the clean up materials.

F. Miscellaneous Requirements

None