State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
BUTLER COUNTY

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: 14-05909
Fac ID: 1409000654
DATE: 2/20/2007

Three Bond International Inc
Annette Ehrhorn-Willeman
6184 Schumacher Park Drive
West Chester, OH 45069

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.

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. 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

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

CC: **USEPA** **HCDES**

FINAL PERMIT TO INSTALL 14-05909

Application Number:	14-05909
Facility ID:	1409000654
Permit Fee:	**$200**
Name of Facility:	Three Bond International Inc
Person to Contact:	Annette Ehrhorn-Willeman
Address:	6184 Schumacher Park Drive West Chester, OH 45069

Location of proposed air contaminant source(s) [emissions unit(s)]:
6184 Schumacher Park Drive
West Chester, **Ohio**

Description of proposed emissions unit(s):
Resin dip coating process.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

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

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)

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.

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

Pollutant	Tons Per Year
Volatile Organic Compounds facility wide	51.3
total HAPs	24.9
individual HAP	9.9

OC	3.3

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 - (R014) - Resin Coating Operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR 63 Subpart MMMM and Nonattainment New Source Review	See terms and conditions A.2.a, A.2.f, B.1 and B.2.
OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.
OAC rule 3745-31-05(A)(3)	See term and condition A.2.b and A.2.e.
ORC 3704.03 (T)(4)	See term and condition A.2.d.

2. Additional Terms and Conditions

2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater), R013 (Dip Coating associated with Tumbling) and R014 (Resin Coating Operation) and all de minimus emissions units (as defined in OAC rule 3745-15-05) and emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently and future to be installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with existing air

contaminant sources limitation upon permit issuance.

2.b The organic compound (OC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.0 pounds of OC per gallon of coating.

2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitations and compliance with the OC emissions limitations.

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic Compounds (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

2.e Organic Compound (OC) emissions from the application of coatings in this emissions unit shall not exceed 18.0 pounds per day and 3.29 tons per year.

2.f The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater), R013 (Dip Coating associated with Tumbling) and R014 (Resin Coating Operation) and all de minimus emissions units (as defined in OAC rule 3745-15-05) and emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently and future to be installed air contaminant sources, combined, shall not exceed 51.30TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R014 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R014 combined shall not exceed 7200 gallons, after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed, as applied.

   c. The total volume, in gallons, of all coatings employed.

   d. The OC content of each coating, in pounds per gallon, as applied.

   e. The total OC emissions from coatings in pounds per day (b x d).

2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all coatings employed.

   d. The VOC content of each coating, in pounds per gallon, as applied.

   e. The total VOC emissions from coatings in pounds per month (b x d).

   f. The name and identification number of each cleanup material employed.

   g. The volume, in gallons, of each cleanup material employed.

   h. The VOC content of each cleanup material employed.

i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).

j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).

k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.

l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:

a. The name and identification number of each coating used.

b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.

c. The total combined HAP content 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 name and identification of each organic cleanup material employed.

f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.

g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].

h. The number of gallons of each organic cleanup material employed.

i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic

cleanup material].

j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the 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. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit R014 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methanol
TLV (ug/m3): 262,086
Maximum Hourly Emission Rate (lbs/hr): 2.06
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 240
MAGLC (ug/m3): 6240

5. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings or cleanup materials (i.e., OC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December,

January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

   If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

   Emissions Limitations:

   18.0 lbs of OC/day and 3.29 TPY OC from coatings

   Applicable Compliance Method:
   The daily OC emissions for coatings shall be determined by multiplying the OC content of applied coatings by the daily application rate. Compliance shall be based on the recordkeeping requirements as specified in term and condition C.1. Compliance with the annual emissions limitation shall be determined by the sum of the dialy records over the preceding calendar year.

   Emissions Limitation:
   51.30 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials

Emissions Unit ID: **R014**

Applicable Compliance Method:
Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emissions Limitations:
The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:
Compliance with the HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical precision statements for Method 24 or 24A.

3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.

4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.

5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.

6. Formulation data shall be used to determine the OC content of the coatings employed.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit to install shall be federally enforceable:

A, B, C.1, through C.3, D, and E.