



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 14-05620

Fac ID: 1431073833

DATE: 10/26/2004

Inwood Automotive Products Co. Inc.
Gil Pullium Jr.
2530 Spring Grove Ave.
Cincinnati, OH 45214

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN

HAMILTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05620 FOR AN AIR CONTAMINANT SOURCE FOR
Inwood Automotive Products Co. Inc.**

On 10/26/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Inwood Automotive Products Co. Inc.**, located at **2530 Spring Grove Ave., Cincinnati, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05620:

This PTI is for an existing Brake Shoe Deriveter. There is a possibility that some of the brake pads being removed may contain asbestos.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05620

Application Number: 14-05620
Facility ID: 1431073833
Permit Fee: **To be entered upon final issuance**
Name of Facility: Inwood Automotive Products Co. Inc.
Person to Contact: Gil Pullium Jr.
Address: 2530 Spring Grove Ave.
Cincinnati, OH 45214

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2530 Spring Grove Ave.
Cincinnati,, Ohio**

Description of proposed emissions unit(s):
This PTI is for an existiing Brake Shoe Deriveter. There is a possibility that some of the brake pads being removed may contain asbestos.

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

Director

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 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.)

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

Inwood Automotive Products Co. Inc.

Facility ID: 1431073833

PTI Application: 14-05620

Issued: To be entered upon final issuance

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

Inwood Automotive Products Co. Inc.

PTI Application: 14-05620

Issued: To be entered upon final issuance

lead to such sanctions

Facility ID: 1431073833

Inwood Automotive Products Co. Inc.

Facility ID: 1431073833

PTI Application: 14-05620

Issued: To be entered upon final issuance

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

Inwood Automotive Products Co. Inc.

Facility ID: 1431073833

PTI Application: 14-05620

Issued: To be entered upon final issuance

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.

Inwood Automotive Products Co. Inc.

Facility ID: 1431073833

PTI Application: 14-05620

Issued: To be entered upon final issuance

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>
PM/PM10	0.06

**Inwoo
PTI A**

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Brake shoe deriveter	OAC rule 3745-31-05(A)(3)	<p>Particulate and PM10 emissions shall not exceed 0.013 lb/hour and 0.06 TPY.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-20-05, OAC rule 3745-20-11 and 40 CFR Part 61, Subpart M.</p>
	OAC rule 3745-20-05 and 3745-20-11.	See terms A.2.a, A.2.b and B.1 through B.6.
	40 CFR Part 61, Subpart M	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-20-05 and OAC rule 3745-20-11.
	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established

11

Inwoo

PTI A

Issued: To be entered upon final issuance

pursuant to OAC rule

3745-31-05(A)(3).

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall discharge no visible emissions to the outside air from this emissions unit.
- 2.b** The permittee shall discharge no visible emissions to the outside air during the collection, processing, packaging, transporting or deposition of any asbestos-containing waste material generated by this emissions unit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the mass emission limitations and the requirements outlined in OAC rule 3745-20 and 40 CFR Part 61, Subpart M.
- 2.d** The hourly emission limitations outlined in section A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. The asbestos containing waste material shall be adequately wetted and sealed in leak tight containers, which is no less than double six-mil bags.
- 2. All containers of asbestos-containing waste material shall be labeled, using permanent markings, with letters of sufficient size and contrast so as to be readily visible and legible, as follows:

"Danger
Contains Asbestos Fibers
Avoid Creating Dust
Cancer and Lung Disease Hazard"

"R.Q., Asbestos
Class 9
NA 2212, III"

- 3. The containers holding asbestos containing waste material which is to be transported off site shall be labeled with the name of the waste generator and the location at which the waste was generated.
- 4. All vehicles used to transport asbestos containing waste shall be marked during the loading and unloading of the waste so that the signs are visible. The signs shall conform to the requirements of 40 CFR Part 61.149(d)(1)(i), (ii), and (iii):

Inwood Automotive Products Co. Inc.
PTI Application: 14-05620
Issued

Facility ID: 1431073833

Emissions Unit ID: P001

Issued: To be entered upon final issuance

"Danger
Asbestos Dust Hazard
Cancer and Lung Disease Hazard
Authorized Personnel Only"

5. The permittee shall complete and maintain waste shipment records for all asbestos waste containing material transported off site, which meets the requirements of OAC rule 3745-20-05(E)(1).
6. The permittee shall deposit all asbestos containing waste as soon as is practical at a waste disposal site operated in accordance with the provisions of 40 CFR Part 61.154 and OAC rule 3745-20-05.

C. Monitoring and/or Recordkeeping Requirements

1. This emissions unit shall be monitored at least once each day during daylight hours for visible emissions to the outside air during periods of operation. The monitoring shall be a visual observation of at least 15 seconds duration.
2. The permittee shall inspect the fabric filter/baghouse at least once each week for proper operation and for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags and for dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the daily visible emission monitoring and the weekly fabric filter/baghouse check which shall include the following:
 - a. the date and time of the inspection;
 - b. presence or absence of visible emissions;
 - c. if visible emissions were observed, what action was taken to correct the problem;
 - d. condition of fabric filters, including presence of any tears, holes or abrasions;
 - e. presence of dust deposits on the clean side of the fabric filters;
 - f. a brief description of any corrective actions taken for the fabric filter; and
 - g. daily hours of operation for the fabric filter.

Inwoo**PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance****D. Reporting Requirements**

1. The permittee shall submit semi-annual reports documenting each day in which visible emissions were observed from this emissions unit and what corrective action was taken. The reports shall be postmarked by January 30 and July 30 of each year and shall cover the previous six calendar months (July-December and January-June).
2. The permittee shall report in writing to the Department of Environmental Services if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within forty-five days of the date the waste was accepted by the initial transporter. Include in the report the following information:
 - a. a copy of the waste shipment record for which a confirmation of delivery was not received; and
 - b. a cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

E. Testing Requirements

1. Compliance with the no visible emission limit in section A.2. of this permit shall be demonstrated by the monitoring and recordkeeping requirements in section C.1. of this permit. The visible emissions observation shall be conducted using Method 22 of 40 CFR Part 60, Appendix A.
2. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

Emission Limitation(s):

0.013 lb/hour PE/PM10

0.06 TPY PE/PM10

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.00013 lb PM/shoe by the maximum process weight rate of 100 shoes/hour. The annual limit is determined by multiplying the hourly limit by 8760 hours per year and dividing by 2000 pounds per ton.

F. Miscellaneous Requirements

None