



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05620**

**Fac ID: 1431073833**

**DATE: 12/16/2004**

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

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

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

cc: USEPA

HCDES



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**Permit To Install  
Terms and Conditions**

**Issue Date: 12/16/2004  
Effective Date: 12/16/2004**

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**FINAL PERMIT TO INSTALL 14-05620**

Application Number: 14-05620  
Facility ID: 1431073833  
Permit Fee: **\$200**  
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 existing 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

**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 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

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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

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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.

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**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

**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.

<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)	Particulate and PM10 emissions shall not exceed 0.013 lb/hour and 0.06 TPY.
	OAC rule 3745-20-05 and 3745-20-11.	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.
	40 CFR Part 61, Subpart M	See terms A.2.a, A.2.b and B.1 through B.6.
	OAC rule 3745-17-07(B)	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 3745-17-08(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).
		The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule  
 3745-31-05(A)(3).

## **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):

"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.

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**Emissions Unit ID: P001**

#### **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

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**PTI A**

**Issued: 12/16/2004**

Emissions Unit ID: **P001**