



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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P.O. Box 1049

Application No: 14-01972

DATE: 7/11/2002

UBE Automotive North America Mason Plant
Rob Howell
4600 Mason-Montgomery Road
Mason, OH 45040

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 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 7/11/2002
Effective Date: 7/11/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-01972

Application Number: 14-01972
APS Premise Number: 1483090313
Permit Fee: **\$100**
Name of Facility: UBE Automotive North America Mason Plant
Person to Contact: Rob Howell
Address: 4600 Mason-Montgomery Road
Mason, OH 45040

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4600 Mason-Montgomery Road
Mason, Ohio**

Description of proposed emissions unit(s):
Modification to change combustion temperature required.

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


Director

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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 Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(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	39.2

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>
K001 - Paint Spray Booth, Aluminum Wheel Line with Drying Oven - Modification	OAC rule 3745-31-05(A)(3)	108.5 lbs VOC/day and 19.8 TPY VOC excluding emissions from cleanup materials
	OAC rule 3745-21-09(B)(6)	19.4 TPY VOC from cleanup materials
		See terms A.2.a, A.2.b, A.2.c, B.1 and B.2.
		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 maintain a capture system and control system (thermal incinerator) for this emissions unit that maintains a VOC capture efficiency which is at least 85% by weight and VOC destruction efficiency which is at least 95% by weight.
- 2.b The VOC content, as applied, of each coating employed in this emissions unit shall not exceed the following limitations, in pounds of VOC per gallon:

Coating Type	VOC Content (lbs/gallon)
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Primer	6.5
Color Coatings	6.76

- 2.c The VOC content of each cleanup material employed in this emission unit shall not exceed 7.3 lbs VOC/gallon of cleanup material.
- 2.d Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, VOC content limitations, emissions limitations, the use of a thermal incinerator and compliance with Air Toxics Policy .

B. Operational Restrictions

- 1. The maximum coating and cleanup material usage for this emissions unit shall not exceed the following limits:

Coating Type	Daily Usage (gallons/day)	Annual Usage (gallons/year)
Primer	30.0	10,950
Color Coatings	54.5	19,900
Cleanup Material	14.5	5,315

- 2. The permittee shall store spent cleanup materials in drums with tight-fitting lids to prevent evaporative loss.
- 3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Record keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain daily records of the following information for this emissions unit:
- a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each primer coating, in pounds per gallon, as applied;
 - c. The VOC content of each color coating, in pounds per gallon, as applied;
 - d. The number of gallons of each primer coating employed;
 - e. The number of gallons of each color coating employed;
 - f. The total number of gallons of coatings employed [summation of (C.2.d for all primer coatings) + (C.2.e for all Color coatings)];
 - g. The total uncontrolled VOC emissions from all coatings employed, in pounds {the summation of [(b x d) for all primer coatings] + [(c x e) for all Color coatings]}; and
 - h. The calculated controlled VOC emissions from all coatings, in pounds [(C.2.g) x (1 minus the overall fractional control efficiency of the thermal incinerator, as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance plus the emissions not captured)];
3. The permittee shall maintain daily records of the following:
- a. The VOC content of each cleanup material employed, in pounds per gallon;
 - b. The number of gallons of each cleanup material employed; and
 - c. The total VOC emissions from all cleanup materials employed, in pounds [summation of (a x b) for all cleanup materials].

4. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Chromium VI

TLV ($\mu\text{g}/\text{m}^3$): 10

Maximum Hourly Emission Rate (lbs/hr): 0.004

Predicted 1-Hour Maximum Ground-Level

Concentration ($\mu\text{g}/\text{m}^3$): 0.02

MAGLC ($\mu\text{g}/\text{m}^3$): 0.24

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30 and January 30 of each year, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an exceedance of the daily VOC emission limitation, daily material usage restriction and/or use of noncomplying coatings or cleanup materials (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month during which the exceedance(s) occurred.
3. The permittee shall also submit annual reports that specify the total amount of controlled VOC emissions (in tons), the total VOC emissions (in tons) from cleanup materials and the total

Emissions Unit ID: **K001**

amount of coating usage (in gallons) of primer coatings and color coatings and cleanup materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the daily VOC emission limitation, annual VOC emission limitations, VOC content limitations and material usage restrictions shall be determined as follows:

a. Emissions Limitation: 108.5 lbs of VOC/day, excluding emissions from cleanup materials

Applicable Compliance Method: Compliance with the daily emission limitation shall be determined by the record keeping requirements specified in Section C.2 of this permit.

b. Emissions Limitation: 19.8 TPY of VOC, excluding emissions from cleanup materials

Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be determined by the summation of the daily VOC emissions as specified in Section C.2. of this permit.

c. Emissions Limitation: 19.4 TPY of VOC from cleanup materials

Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be determined by the summation of the daily VOC emissions as specified in Section C.3. of this permit.

d. VOC Content Limitations:

Coating Type	VOC Content
Primer	6.5 lbs/gallon
Color Coatings	6.76 lbs/gallon
Cleanup Material	7.3 lbs/gallon

Applicable Compliance Method: Compliance with the VOC content limitations shall be determined by the record keeping requirements specified in Sections C.2 and C.3.

USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of 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 or ink, the permittee shall so notify the

UBE /

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Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Material Usage Restrictions:

Coating Type	Daily Usage (gallons/day)	Annual Usage (gallons/year)
Primer	30.0	10,950
Color Coatings	54.5	19,900
Cleanup Material	14.5	5,315

Applicable Compliance Method: Compliance with the material usage restrictions shall be determined by the record keeping requirements specified in Sections C.2 and C.3.

2. Compliance with the capture and control efficiency requirements for VOC emissions shall be determined by performance testing using the appropriate USEPA test methods.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-01972 issued October 24, 1990.