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Facility Name: **Stolle Products**

Application Number: **05-8974**

Date: **September 2, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Stolle Products** located in **Shelby** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P080	750 ton hydraulic press	*	3745-31-05 3745-21-07 (G) (2)	Emissions of organic compounds shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 TPY

* BAT has been determined as compliance with the applicable OAC rules/specified allowable emission rates; compliance with Ohio EPA's Air Toxics Policy.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	7.3

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. This permit is based on the use of the photochemically reactive materials specified by the permittee in PTI application number 05-8974. In conjunction with best available technology requirements of OAC 3745-31-05, the emission limitations specified in the following table were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the photochemically reactive material formulation data and the design parameters of the emission unit's exhaust system as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated based on the following data input to the Screen3 model:

	Stoddard	
	Solvent	
	(Hydro-trea	
Pollutant	ted Heavy	TLV
	Naphtha)	(ug/m ³)

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525,000

	Predicted 1 Hour Maximum Hourly Emission Rate (lbs/hr)	Maximum Acceptable Ground-Level Concentration (MAGLC = TLV/42) (ug/m ³)
	8	12,500
		10,550

Note: All emissions were assumed to be from the most toxic compound employed. Modeling results were compared to the MAGLC of the most toxic compound. This assumption provides operational flexibility in the use of less toxic compounds. The TLV for Stoddard Solvent was obtained from ACGIH's 1997 Handbook. If the TLV for Stoddard Solvent decreases in any future ACGIH Handbook, P080 shall

remain in compliance with the MAGLC specified above.

2. Any of the following changes may be deemed a modification to the emissions unit and, as such, prior notification to and approval from Ohio EPA's Southwest District Office are required:
 - a. any change in the composition of the lubricating oil, or the use of new photochemically reactive 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 specified in the above table;
 - b. any change to the emission unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, decreased stack height) that would result in an exceedance

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of the Maximum Acceptable Ground Level Concentration (MAGLC) specified in the above table;

- c. any change in the composition of the lubricating oil, or use of new photochemically reactive materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];
- d. any change in the composition of the lubricating oil, or use of new photochemically reactive materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC 3745-77-01(V); and,
- e. any change to the emission unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as otherwise defined in OAC rule 3745-31-01.

B. Operational Restrictions

1. None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for P080:
 - a. the company identification for each photochemically reactive material employed;
 - b. the number of gallons of each photochemically reactive material employed;
 - c. the volatile organic compound content of each photochemically reactive material, in pounds per gallon;
 - d. the total volatile organic compound emission rate for all photochemically reactive materials, in

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pounds per day;

- e. the total number of hours P080 was in operation; and
- f. the average hourly volatile organic compound emission rate for all photochemically reactive materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The collected information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C) (5).]

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the photochemically reactive materials exceeded 8 pounds per hour, and the actual average hourly

volatile organic compound emissions for each such day; and,
 - b. an identification of each day during which the organic compound emissions from the photochemically reactive materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.
2. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to

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Ohio EPA's Southwest District Office; and,

- b. except as otherwise may be provided in the terms and conditions for a specific emission 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 Ohio EPA's Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from any malfunction reported in accordance with OAC rule 3745-15-06).

E. Testing Requirements

1. Compliance with the hourly organic compound emission limit shall be based upon the recordkeeping requirements contained in Section C.1. of this permit.
2. Compliance with the daily organic compound emission limit shall be based upon the recordkeeping requirements contained in Section C.1. of this permit.
3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of the photochemically reactive materials.

F. Miscellaneous Requirements

1. None.