State of Ohio Environmental Protection Agency

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

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: 16-02139

DATE: 8/28/2001

Wellman Friction Products
Peggy Mullins
920 Lake Rd
Medina, OH 44256

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

CC: **USEPA** **ARAQMD**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 8/28/2001**
Terms and Conditions	**Effective Date: 8/28/2001**

FINAL PERMIT TO INSTALL 16-02139

Application Number:	16-02139
APS Premise Number:	1652050085
Permit Fee:	**$600**
Name of Facility:	Wellman Friction Products
Person to Contact:	Peggy Mullins
Address:	920 Lake Rd Medina, OH 44256

Location of proposed air contaminant source(s) [emissions unit(s)]:
920 Lake Rd
Medina, **Ohio**

Description of proposed emissions unit(s):
Spray Booth, Pyrolytic Incinerator.

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 Related to Monitoring and Recordkeeping 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 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 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

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 thirty (30) 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
VOC	3.73
PE	0.09
CO	0.22
NOx	0.22
SO2	0.04

Emissions Unit ID: **K003**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Binks 1 ½ inch spindle conveyor paint coating line - miscellaneous metal parts coating line.	OAC rule 3745-31-05(A)(3)	17.2 pounds of volatile organic compounds (VOC) per day for coatings 3.64 tons of VOC per year for coatings and cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See B.1 below.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings employed (i.e., the sum of (b) times (d) for each coating), in pounds per day.

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000 lbs/ton), in tons; and

e. the total VOC emissions from all coatings and cleanup materials employed, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions exceeded 17.2 pounds per day, and the actual daily VOC emissions for each such day.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.b.

E. Testing Requirements

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

a. Emission Limitation

17.2 pounds of VOC per day for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section C.1. Formulation data or USEPA Method 24 or 24A shall be use to determine the VOC content for each coating.

b. Emission Limitation

3.64 tons of VOC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in sections C.1 and C.2. Formulation data or USEPA Method 24 or 24A shall be use to determine the VOC content for each coating and each cleanup material.

F. Miscellaneous Requirements

None

Emissions Unit ID: **N001**

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	Applicable Rules/Requirements	
N001 - Coating line cleaning oven - pyrolytic incinerator.	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-09

Applicable Emissions Limitations/Control Measures
0.02 pound of particulate emissions (PE) per hour
0.09 ton of PE per year
0.05 pound of carbon monoxide (CO) per hour
0.22 ton of CO per year
0.05 pound of nitrogen oxides (NOx) per hour
0.22 ton of NOx per year
0.01 pound of sulfur dioxide (SO2) per hour
0.04 ton of SO2 per year
0.02 pound of volatile organic compounds (VOC) per hour
0.09 ton of VOC per year
Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09.
The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged
The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The permittee shall only burn natural gas as fuel in this emissions unit.

2. The permittee shall not process parts which may emit vapors of toxic metals such as lead or mercury.

3. The permittee shall not process parts or materials containing coatings or plastics which contain halogens such as chlorine, fluorine, or bromine.

4. No parts or materials shall be charged until sufficient time has been allowed for the preheating of the secondary chamber. Both the primary and secondary burners shall be kept in operation during the entire time the incinerator is in use. The auxiliary burner shall be fired until the necessary burn-down time is achieved.

5. The secondary chamber of the incinerator shall be maintained at a temperature of at least 1400 degrees Fahrenheit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain following information for this emissions unit:

   a. the MSDS sheets for each material being removed from the salvageable material;

   b. documentation as to whether or not the material being removed contains any toxic metals; and

   c. documentation as to whether or not the material being removed contains any halogens.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the secondary chamber of the 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.

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

   a. all 3-hour blocks of time during which the average combustion temperature within the secondary chamber of the incinerator, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit; and

   b. a log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the processing of material in the incinerator that is prohibited in sections B.2 and B.3 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average temperature within the secondary chamber of the incinerator does not comply with the temperature limitation specified above.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.b.

E. Testing Requirements

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

   a. <u>Emission Limitation</u>

      0.02 pound of PE per hour

      <u>Applicable Compliance Method</u>

      Multiply the allowable emission limitation of 0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged by the maximum amount of material charged.

   b. <u>Emission Limitation</u>

0.09 ton of PE per year

Applicable Compliance Method

Multiply the allowable hourly particulate emission limitation by 8760 hours per year, and then divide by 2000.

c. Emission Limitation

0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged

Applicable Compliance Method

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(8).

d. Emission Limitation

5% opacity as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

e. Emission Limitation

0.05 pound of CO per hour

Applicable Compliance Method

Multiply the US EPA Fire 6.22 (SCC 5-02-001-01) carbon monoxide emission factor of 10 pounds of carbon monoxide per ton of solid waste burned by the maximum hourly amount of solid waste burned.

f. Emission Limitation

0.22 ton of CO per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for carbon monoxide by 8760 hours per year, and then divide by 2000.

g. Emission Limitation

0.05 pound of NOx per hour

Applicable Compliance Method

Multiply the AP-42 (Table 1.4-1 date 7-98) nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides per million standard cubic feet of natural gas fired by the maximum hourly amount of natural gas fired.

h. Emission Limitation

0.22 ton of NOx per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for nitrogen oxides by 8760 hours per year, and then divide by 2000.

i. Emission Limitation

0.01 pound of SO2 per hour

Applicable Compliance Method

Multiply the US EPA Fire 6.22 (SCC 5-02-001-01) sulfur dioxide emission factor of 2.5 pounds of sulfur dioxide per ton of solid waste burned by the maximum hourly amount of solid waste burned.

j. Emission Limitation

0.04 ton of SO2 per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for sulfur dioxide by 8760 hours per year, and then divide by 2000.

k. Emission Limitation

0.02 pound of VOC per hour

Applicable Compliance Method

Multiply the US EPA Fire 6.22 (SCC 5-02-001-01) volatile organic compounds emission factor of 3.0 pounds of volatile organic compounds per ton of solid waste burned by the maximum hourly amount of solid waste burned.

l. Emission Limitation

0.09 ton of VOC per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for volatile organic compounds by 8760 hours per year, and then divide by 2000.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 16-02139 Facility ID: 1652050085

FACILITY NAME Wellman Friction Products

FACILITY DESCRIPTION Spray Booth, Pyrolytic Incinerator. CITY/TWP Medina

Emissions Unit ID: **N001**

SIC CODE 3499 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Binks 1 ½ inch spindle conveyor paint coating line - miscellaneous metal parts coating line.

DATE INSTALLED May 1995

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds			1.4	17.2 pounds/day	3.64
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
3 gallons of coating per day/OAC rule 3745-21-09(U)(2)(e)(ii)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

13873.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 16-02139 Facility ID: 1652050085

FACILITY NAME Wellman Friction Products

FACILITY DESCRIPTION Spray Booth, Pyrolytic Incinerator. CITY/TWP Medina

Emissions Unit ID: **N001**

SIC CODE 3499 SCC CODE 5-02-001-01 EMISSIONS UNIT ID N001

EMISSIONS UNIT DESCRIPTION Coating line cleaning oven - pyrolytic incinerator.

DATE INSTALLED April 1998

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.014	0.02 pound/hr and 0.02 pound per 100 pounds charged	0.09
PM_{10}					
Sulfur Dioxide			0.002	0.01 lb/hr	0.04
Organic Compounds			0.02	0.02 lb/hr	0.09
Nitrogen Oxides			0.03	0.05 lb/hr	0.22
Carbon Monoxide			0.05	0.05 lb/hr	0.22
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of the permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____