



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 16-02457

Fac ID: 1667050017

DATE: 10/3/2006

Eaton Corp
Jesse Nelson
10585 Main St
Mantua, OH 44255

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 **\$400** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

Akron Metropolitan Area Transportation Study

WV

PA



**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 16-02457

Application Number: 16-02457
Facility ID: 1667050017
Permit Fee: **To be entered upon final issuance**
Name of Facility: Eaton Corp
Person to Contact: Jesse Nelson
Address: 10585 Main St
Mantua, OH 44255

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10585 Main St
Mantua, Ohio**

Description of proposed emissions unit(s):
Two (2) Karg Braiders.

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

Eaton Corp

Facility ID: 1667050017

PTI Application: 16-02457

Issued: To be entered upon final issuance

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 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,

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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.

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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 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

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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.

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.

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SUMMARY (for informational purposes only)**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Materials	14.6
Methylene Chloride	*9.95
Combined HAPs	*24.0

* Facility wide rolling 12-month limit

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>
P018 - Karg Braider O1 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). Methylene chloride emissions shall not exceed 4.7 lbs/day, and 0.86 ton per year. Organic compound (OC) emissions shall not exceed 40.0 lbs/day and 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr (See 2.a below.)
	OAC rule 3745-31-05(C)	See B.1 below.

2. Additional Terms and Conditions

- 2.a The daily emission limitation specified by this rule is equivalent to the daily emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The hourly, daily and annual OC emission limitations were established for PTI purposes and are greater than the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these emission limitations.

Emissions Unit ID: P018

- 2.c The daily and annual methylene chloride emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and /or reporting requirements to ensure compliance with these emission limitations.

B. Operational Restrictions

1. The total annual emissions from the entire facility shall not exceed 9.95 tons per rolling, 12-month period for each individual HAP, and 24.0 tons per rolling, 12-month period for all the HAPs, combined. To ensure these limits are met, the permittee is committing to meet the operational restriction listed in Section B.2 of this permit.

*methylene chloride is the only HAP employed in this emissions unit

2. The daily number of hours of operation for this emissions unit shall not exceed 19.5 hours.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for the entire facility:
- The company identification for each adhesive material employed;
 - The number of gallons of each adhesive material employed;
 - The methylene chloride* content of each adhesive material employed, in pounds per gallon;
 - The total methylene chloride emission rate for all the adhesive materials employed, in pounds; and
 - The rolling, 12 month methylene chloride emission rate, in tons.

*[Please note that methylene chloride is the only HAP employed in this emissions unit.]

2. The permittee shall record and maintain each day the number of hours the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality

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Management District that summarize the actual annual emissions of HAPs. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. All exceedances of the daily restriction on the number of hours of operation of 19.0 hours, and the actual total operating hours for each such day.
 - b. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

8 lbs OC/hr
 40 pounds per day OC
 7.3 tons per year OC

Applicable Compliance Method:

The hourly, daily and annual emission limitations are greater than the emissions unit's potentials to emit.

The hourly potential to emit for OC is calculated by multiplying the maximum usage rate of moisture cured urethane of 1 pound/hr by the maximum OC content of 20%, by weight.

The daily potential to emit for OC is calculated by multiplying the maximum usage rate of the moisture cured urethane of 23.7 pounds/day by the maximum OC content of 20%, by weight.

The annual potential to emit for OC is calculated by multiplying the daily OC

Eaton**PTI A**Emissions Unit ID: **P018****Issued: To be entered upon final issuance**

emissions by 365.

If required, compliance with the hourly OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

4.7 lbs methylene chloride/day
0.86 ton methylene chloride/year

Applicable Compliance Method:

The daily allowable methylene chloride emission limitation was established by multiplying the maximum usage of the moisture cured urethane of 23.7 pounds/day by the maximum methylene chloride content of 20%, by weight.

As long as compliance with the daily methylene chloride emission limitation is maintained, compliance with the annual methylene chloride emission limitation shall be ensured (the annual limitation was calculated by multiplying the daily limitation by 365, and then dividing by 2000 pounds/ton).

c. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

F. Miscellaneous Requirements

None

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Eaton

PTI A

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Emissions Unit ID: **P018**

**Eaton
PTI A**

Emissions Unit ID: **P019**

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

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>
P019 - Karg Braider O2 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). Methylene chloride emissions shall not exceed 4.7 lbs/day, and 0.86 ton per year.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 40.0 lbs/day and 7.3 tons per year. 8 lbs OC/hr (See 2.a below.)
	OAC rule 3745-31-05(C)	See B.1 below.

2. Additional Terms and Conditions

- 2.a The daily emission limitation specified by this rule is equivalent to the daily emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The hourly, daily and annual OC emission limitations were established for PTI purposes and are greater than the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these emission limitations.

Emissions Unit ID: P019

- 2.c The daily and annual methylene chloride emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and /or reporting requirements to ensure compliance with these emission limitations.

B. Operational Restrictions

1. The total annual emissions from the entire facility shall not exceed 9.95 tons per rolling, 12-month period for each individual HAP, and 24.0 tons per rolling, 12-month period for all the HAPs, combined. To ensure these limits are met, the permittee is committing to meet the operational restriction listed in Section B.2 of this permit.

*methylene chloride is the only HAP employed in this emissions unit

2. The daily number of hours of operation for this emissions unit shall not exceed 19.5 hours.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for the entire facility:
- The company identification for each adhesive material employed;
 - The number of gallons of each adhesive material employed;
 - The methylene chloride* content of each adhesive material employed, in pounds per gallon;
 - The total methylene chloride emission rate for all the adhesive materials employed, in pounds; and
 - The rolling, 12 month methylene chloride emission rate, in tons.

*[Please note that methylene chloride is the only HAP employed in this emissions unit.]

2. The permittee shall record and maintain each day the number of hours the emissions unit was in operation.

D. Reporting Requirements

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1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. All exceedances of the daily restriction on the number of hours of operation of 19.0 hours, and the actual total operating hours for each such day.
 - b. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

8 lbs OC/hr
40 pounds per day OC
7.3 tons per year OC

Applicable Compliance Method:

The hourly, daily and annual emission limitations are greater than the emissions unit's potentials to emit.

The hourly potential to emit for OC is calculated by multiplying the maximum usage rate of moisture cured urethane of 1 pound/hr by the maximum OC content of 20%, by weight.

The daily potential to emit for OC is calculated by multiplying the maximum

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usage rate of the moisture cured urethane of 23.7 pounds/day by the maximum OC content of 20%, by weight.

The annual potential to emit for OC is calculated by multiplying the daily OC emissions by 365.

If required, compliance with the hourly OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

4.7 lbs methylene chloride/day
0.86 ton methylene chloride/year

Applicable Compliance Method:

The daily allowable methylene chloride emission limitation was established by multiplying the maximum usage of the moisture cured urethane of 23.7 pounds/day by the maximum methylene chloride content of 20%, by weight.

As long as compliance with the daily methylene chloride emission limitation is maintained, compliance with the annual methylene chloride emission limitation shall be ensured (the annual limitation was calculated by multiplying the daily limitation by 365, and then dividing by 2000 pounds/ton).

c. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

Eaton Corp

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Issue:

Facility ID: 1667050017

Emissions Unit ID: P019

F. Miscellaneous Requirements

None