



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

7/1/2016

Kevin Gearig  
 DTR Industries Incorporated  
 320 Snider Road  
 Bluffton, OH 45817

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0302000166  
 Permit Number: P0120986  
 Permit Type: Administrative Modification  
 County: Allen

Certified Mail

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

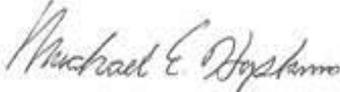
This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Indiana



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
DTR Industries Incorporated**

Facility ID:	0302000166
Permit Number:	P0120986
Permit Type:	Administrative Modification
Issued:	7/1/2016
Effective:	7/1/2016





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
DTR Industries Incorporated

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**Final Permit-to-Install**  
DTR Industries Incorporated  
**Permit Number:** P0120986  
**Facility ID:** 0302000166  
**Effective Date:** 7/1/2016

## Authorization

Facility ID: 0302000166  
Facility Description: Anti-vibration rubber and automotive hose parts manufacturing facility.  
Application Number(s): A0056240  
Permit Number: P0120986  
Permit Description: Administrative modification to update the the potential to emit for auto adhesive spray machine 8 (K031) and glycol dip tanks 2 and 7 (P047 and P053, respectively). The synthetic minor limit to avoid PSD will remain unchanged with this permitting action.  
Permit Type: Administrative Modification  
Permit Fee: \$300.00  
Issue Date: 7/1/2016  
Effective Date: 7/1/2016

This document constitutes issuance to:

DTR Industries Incorporated  
320 Snider Road  
Bluffton, OH 45817

of a Permit-to-Install for the emissions unit(s) identified on the following page.

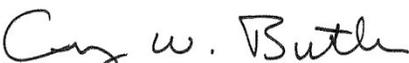
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0120986

Permit Description: Administrative modification to update the the potential to emit for auto adhesive spray machine 8 (K031) and glycol dip tanks 2 and 7 (P047 and P053, respectively). The synthetic minor limit to avoid PSD will remain unchanged with this permitting action.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:** **K031**  
Company Equipment ID: Automatic Adhesive Spray Machine No. 8 (B361-1)  
Superseded Permit Number: 03-13938  
General Permit Category and Type: Not Applicable

**Group Name: Glycol Dip Tanks 2 and 7**

<b>Emissions Unit ID:</b>	<b>P047</b>
Company Equipment ID:	Glycol Dip Tank No.2 w/(2) Steam Cleaning Systems(B329)
Superseded Permit Number:	03-13938
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P053</b>
Company Equipment ID:	Glycol Dip Tank No.7 w/(1) Steam Cleaning System (B507)
Superseded Permit Number:	03-13938
General Permit Category andType:	Not Applicable



**Final Permit-to-Install**  
DTR Industries Incorporated  
**Permit Number:** P0120986  
**Facility ID:** 0302000166  
**Effective Date:** 7/1/2016

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 state-only required 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 DAPC, Northwest District Office. 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, 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.)

**10. 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) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

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

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
DTR Industries Incorporated  
**Permit Number:** P0120986  
**Facility ID:** 0302000166  
**Effective Date:** 7/1/2016

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following significant emissions units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products): K031. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart MMMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart MMMM, and in Subpart A.

All the requirements of 40 CFR Part 63, Subpart MMMM, have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart MMMM, have been cited in the appropriate sections for the non-insignificant emissions units subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



**Final Permit-to-Install**  
DTR Industries Incorporated  
**Permit Number:** P0120986  
**Facility ID:** 0302000166  
**Effective Date:** 7/1/2016

## **C. Emissions Unit Terms and Conditions**

**1. K031, Automatic Adhesive Spray Machine No. 8 (B361-1)**

**Operations, Property and/or Equipment Description:**

Auto adhesive spray 8 (B361) miscellaneous metal parts coating operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3) and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents</p> <p>7.07 lbs organic compounds (OC)/hour and 30.97 tons OC/year (including clean-up materials)</p> <p>0.15 lb particulate emissions (PE)/hour and 0.66 ton PE/year</p> <p>Visible particulate emissions shall not exceed 0% opacity as a 6-minute average</p> <p>0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined*</p> <p>*This emissions limit was established in PTI 03-17419, issued 10-08-2009, for all emissions units controlled by the RTO.</p> <p>See b)(2)a. and b)(2)b.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined  See b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(U)(2)(f)	See b)(2)a.
d.	OAC rule 3745-17-11(C)	See c)(1)

(2) Additional Terms and Conditions

- a. Permit to Install (PTI) #03-10256 was issued on March 1, 2001, with terms and conditions that defined Best Available Technology (BAT) as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- b. For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- c. The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Coating operations, emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c) Operational Restrictions

- (1) The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- (2) In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, combined.
  - a. The name and identification number of each coating and clean-up material;
  - b. The OC content of each coating and clean-up material, as applied;
  - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [the VOC content excluding water and exempt solvents

shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,<sup>2</sup>];

- d. The number of gallons of each coating and clean-up material employed;
  - e. The OC emission rates from each coating and clean-up material employed d)(2)b. x d)(2)d.;
  - f. The total OC emission rate from all coatings and clean-up material employed, [summation of d)(2)e.]; and
  - g. The rolling 365-day summation of the total OC emission rate.
- (3) Permit to Install #03-10256 for this emissions unit, K031, was evaluated based on the actual materials (typically coatings and clean-up 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, the SCREEN 3.0 and Industrial Source Complex – Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene

TLV (ug/m<sup>3</sup>): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m<sup>3</sup>): 2225\*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4048

Pollutant: Xylene

TLV (ug/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 13.12

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m<sup>3</sup>): 9758\*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 10333

Pollutant: Ethyl Benzene\*\*

TLV (ug/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m<sup>3</sup>): 3353\*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 10333

Pollutant: Toluene

TLV (ug/m<sup>3</sup>): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.46  
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond  
the Fenceline (ug/m3): 1418\*\*\*  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone  
TLV (ug/m3): 205,000  
Maximum Hourly Emission Rate (lbs/hr): 23.87  
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond  
the Fenceline (ug/m3): 2220\*\*\*  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

\* Based on Screen 3 model

\*\* The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

\*\*\* Based on ISCST3 model

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or clean-up 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 compositions 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.).
- (4) If the permittee determines that the "Air Toxic Policy" will be satisfied for 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 OAC rule 3745-31-01(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 evaluation to determine that the changed emissions unit will still 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. Where computer modeling as performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash of dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- (2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K031 which identify exceedances of any of the following:
  - a. Any exceedances of the VOC content restrictions in section b)(2)a. of this permit; and
  - b. Any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit.\* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit is based on a two-part coating system of primer and topcoat, including clean-up materials, with a maximum usage of 1.01 gallons/hour [as established in PTI #03-10256] at a maximum OC content of 7.0 lbs/gallon.

b. Emission Limitations:

30.97 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit.\* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

c. Emission Limitations:

0.15 lb PE/hour and 0.66 ton PE/year

Applicable Compliance Method:

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

Where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs/ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A – Test Methods 1-5.

d. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitations:

0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO.

If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

f. Emission Limitation:

255 tons OC per rolling, 365-day period, from all Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043, combined.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

g. Emission Limitation:

7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(2) of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coating by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating as received, by Reference Method 24. If the permittee uses formulation data supplied by the manufacturer, the permittee may be required to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or any equivalent alternative method.

- g) Miscellaneous Requirements
  - (1) None.

**2. Emissions Unit Group –Glycol Dip Tanks 2 and 7: P047, P053**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P047	Glycol dip tank no.2 with (2) steam clean systems (B329)
P053	Glycol dip tank no.7 with (1) steam clean system (B507)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3) and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions units P047 and P053, individually: 1.37 lbs OC/hr and 6.00 tons OC/yr  See b)(2)a.
b.	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emissions units identified in b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with OAC rule 3745-31-05(D).

b. The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined, for purposes of avoiding PSD applicability. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

c) Operational Restrictions

(1) The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined, shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for

these emissions units. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following each month for each Anti-Vibration Glycol Dipping Process Operations emissions unit, P047 and P053, individually:
  - a. The production rate; and
  - b. The calculated OC emissions in lbs or tons using the following equation:  
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ lb OC/unit produced}).$$
- (2) The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined:
  - a. The rolling 12-month summation of monthly OC emissions rates, in tons [summation of d)(1)b. for all Anti-Vibration emissions units].
- (3) Permit to Install #03-10256 for these emissions unit, P047 and P053, was evaluated based on the actual materials (typically coatings and clean-up 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, the SCREEN 3.0 and Industrial Source Complex – Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Toxic Contaminant: Ethylene Glycol

TLV (mg/m<sup>3</sup>): 1.755

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 117.4\*

MAGLC (ug/m<sup>3</sup>): 1755.0

\* Based on Screen 3 model

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or clean-up 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 compositions 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.).
- (4) If the permittee determines that the “Air Toxic Policy” will be satisfied for 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 OAC rule 3745-31-01(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 evaluation to determine that the changed emissions unit will still 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

Where computer modeling as performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined. The deviation reports shall be submitted in accordance with 6th Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

1.37 lbs OC/hr and 6.00 tons OC/yr for emissions units P047 and P053, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 190 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

33.0 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073, combined

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.