Facility Name: **North American Manufacturing Co**
Application Number: **13-03218**
Date: **January 6, 2000**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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Facility Name: **North American Manufacturing Co**
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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

AIR EMISSION SUMMARY

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

Ohio EPA Source Number	K003 Cont'd	Source Identification Description
K003		DeVilbiss paint booth with DeVilbiss spray gun and fabric filter

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		BAT Determination Compliance with the terms and conditions of this permit and a fabric filter must be employed		

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
			Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
			3745-31-05 (A)(3)	K003 shall be limited to: 520.5 lbs/day and 95.0 TPY VOC; 54.2 lbs/day and 9.9 TPY of each individual HAP (toluene, xylene, etc.); 136 lbs/day and 24.8 TPY of combined HAPs; 3.5 $\frac{\text{lbs VOC}}{\text{Gal}}$ excluding water and exempt solvents
			3745-35-07 (B)	See Additional Special Terms and Conditions, B. Operational Restrictions
			3745-21-09 (U)(1)(c)	K003 shall be limited to using coatings a maximum VOC content of 3.5 $\frac{\text{lbs VOC}}{\text{gal}}$ excluding water and exempt solvents

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	95.0
HAPs (combined)	24.8
HAPs (each individual HAP)	9.9

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

WASTE DISPOSAL

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

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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

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NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. See Air Emissions Summary

2. Additional Terms and Conditions

   a. The maximum total emissions of individual HAPs (toluene, xylene, etc.) for emissions units K003, K001 and K002 combined shall not exceed 54.2 pounds per day and 9.9 tons/year.

   b. The maximum total emissions of combined HAPs for emissions units K003, K001 and K002 combined shall not exceed 136 pounds per day and 24.8 tons/year.

   c. The maximum total emissions of VOC for emissions units K003, K001 and K002 combined shall not exceed 520.5 pounds per day and 95.0 tons/year.

B. Operational Restrictions

1. The maximum annual VOC usage for emissions unit K003 (combined with K001 and K002) shall not exceed 95.0 tons, based upon a rolling 365-day summation. This usage limit shall include VOC emitted from all coating and cleanup materials.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage
1	23.75
1-2	30.23
1-3	36.71
1-4	43.19
1-5	49.67
1-6	56.15
1-7	62.63
1-8	69.11
1-9	75.59
1-10	82.07
1-11	88.55
1-12	95.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage rate limitation shall be based upon a rolling, 365-day summation of the usage rates.

2. The maximum annual usage of any individual HAPs (toluene, xylene, etc.) shall not exceed 9.9 tons, based upon a rolling, 365-day summation. This usage limit shall include each individual HAP emitted from all coating and cleanup materials.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage
1	2.48
1-2	3.16
1-3	3.82
1-4	4.50
1-5	5.17
1-6	5.83
1-7	6.50
1-8	7.17
1-9	7.84
1-10	8.51
1-11	9.19
1-12	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage rate limitation shall be based upon a

rolling, 365-day summation of the usage rates.

3. The maximum annual usage for combined HAPs (facility-wide) shall not exceed 24.8 tons, based upon a rolling, 365-day summation. This usage limit shall include combined HAPs emitted from all coating and cleanup materials.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage
1	6.20
1-2	7.89
1-3	9.58
1-4	11.27
1-5	12.96
1-6	14.65
1-7	16.34
1-8	18.03
1-9	19.72
1-10	21.41
1-11	23.11
1-12	24.80

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage rate limitation shall be based upon a rolling, 365-day summation of the usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, on a daily basis, for emissions unit K003 (combined with units K001 and K002).

   (This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

   a. The name and identification number of each coating, as applied.

   b. The VOC, individual HAPs, and total combined HAPs content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon for each constituent.

   c. The number of gallons (excluding water and exempt solvents) of each coating employed.

   d. The total emissions (usage) of VOC, individual HAPs, and total combined HAPs for all coatings employed, in pounds for each constituent.

   e. The name and identification of each cleanup material employed.

   f. The VOC, individual HAPs, and total combined HAPs content of each cleanup material, in pounds per gallon for each constituent.

   g. The number of gallons of each cleanup material employed.

   h. The total emissions (usage) of VOC, individual HAPs, and total combined HAPs for all cleanup materials employed, in pounds for each constituent.

   i. The total emissions (usage) of VOC, individual HAPs, and total combined HAPs for all coatings and cleanup materials, in pounds for each constituent.

2. The permittee shall maintain daily records of the following information:

   a. The material usage for each day, for VOC, each individual HAP and combined HAPs.

   b. Beginning after the first 12 calendar months of operation following issuance of this permit to install, the rolling, 365-day summation of the usage rates for VOC, each individual HAP and combined HAPs.

   Also, during the first 12 calendar months of operation following, the permittee shall record the cumulative usage rates for each calendar month.

D. Reporting Requirements

1. The permittee shall notify the Director of any daily record showing the use of noncomplying coatings (i.e., coatings that do not comply with the VOC content limitation of 3.5 pounds per gallon, excluding water and exempt solvents). A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and annual emission limitations for individual HAPs, combined HAPs, and VOC.

3. The permittee shall submit annual reports that specify the emissions of individual HAPs, combined HAPs, and VOC for the preceding calendar year. The reports shall be submitted by February 15 of each year.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 365-day usage limitations, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels. These reports are due by the date described in the following term.

5. 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.)

E. Testing Requirements

Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

1. Limitation(s):

   95.0 tpy (520.5 lbs/day) VOC
   9.9 tpy (54.2 lbs/day) individual HAPs
   24.8 tpy (136 lbs/day) combined HAPs

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the monitoring and recordkeeping. Also, at the request of the Ohio EPA, compliance shall be determined by the USEPA Method 24.

The short term emissions may be calculated by the following equation (for each material):

(VOC (or HAP) content (lbs/gal) x usage (gal/day). From this equation the lb/day and annual emissions rate may be calculated.

F. Miscellaneous

None.