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Facility Name: **Electrovations Inc**

Application Number: **16-1824**

Date: **March 10, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

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

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

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BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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

The air contaminant emissions units listed below comprise the Permit to Install for **Electrovations Inc** located in **Portage** 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.

K004

Ohio
EPA
Source
Number

K003

K001

K005 cont'd

K002

K006

K003 cont'd

K005

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				Lacquer Saturant Application Line #2
			Source Identification <u>Description</u>	
	K008		Lacquer Saturant Application Line #1	
K007				
	K008 cont'd			Lacquer Saturant Application Line #3
		K010		
	K009			

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	Saturant Application Line #5		Silicones and Enamels Saturant Application Line #8	
Lacquer Saturant Application Line #4		Silicones and Enamels Saturant Application Line #7		Silicones and Enamels Saturant Application Line #10
	Lacquer Saturant Application Line #6		Silicones and Enamels Saturant Application Line #9	
Lacquer				

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BAT <u>Determination</u>		Compliance with the terms and conditions of this permit and the "Air Toxics Policy".		Compliance with the terms and conditions of this permit and the "Air Toxics Policy".
Compliance with the terms and conditions of this permit and the "Air Toxics Policy".	Compliance with the terms and conditions of this permit and the "Air Toxics Policy".		Compliance with the terms and conditions of this permit and the "Air Toxics Policy".	
		Compliance with the terms and conditions of this permit and the "Air Toxics Policy".		Compliance with the terms and conditions of this permit and the "Air Toxics Policy".

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				3745-31-05
			Applicable Federal & <u>OAC Rules</u>	
			3745-31-05	
Compliance with the terms and conditions of this permit and the "Air Toxics Policy"	Compliance with the terms and conditions of this permit and the "Air Toxics Policy".	Compliance with the terms and conditions of this permit and the "Air Toxics Policy".		3745-21-09 (U) (2) (e)
				3745-31-05
			3745-21-09 (U) (2) (e)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	coatings and thinning solvents	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	thinning solvents	materials
Permit Allowable Mass Emissions and/or Control/Usage Requirements	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	See Additional Special Term and Condition A.1.	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	See Additional Special Term and Condition A.1.
maximum daily coating and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent	See Additional Special Term and Condition A.1.	maximum daily coating and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent	See Additional Special Term and Condition A.1.	maximum daily coating and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent
19.7 lbs/day organic compounds (OC) for	19.7 lbs/day OC for coatings and thinning solvents	19.7 lbs/day OC for coatings and thinning solvents	19.7 lbs/day OC for coatings and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent	19.7 lbs/day OC for coatings and thinning solvents
	maximum daily coating and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	3.7 TPY OC for coatings, thinning solvents, and cleanup materials
	19.7 lbs/day OC for coatings and thinning solvents	See Additional Special Term and Condition A.1.	19.7 lbs/day OC for coatings and thinning solvents	See Additional Special Term and Condition A.1.
	19.7 lbs/day OC for coatings and thinning solvents	maximum daily coating and thinning solvent usage shall not exceed 3.0 gallons of coating and thinning solvent	3.7 TPY OC for coatings, thinning solvents, and cleanup materials	maximum daily coating and thinning solvent usage shall not exceed 8.0 gallons of

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
coating and thinning solvent usage shall not exceed 8.0 gallons of coating and thinning solvent	daily coating and thinning solvent usage shall not exceed 8.0 gallons of coating and thinning solvent	gallons of coating and thinning solvent shall not exceed 8.0 gallons of coating and thinning solvents	See Additional Special Term and Condition A.1.	
55.4 lbs/day OC for coating and thinning solvents	55.4 lbs/day OC for coatings and thinning solvents	55.4 lbs/day OC for coatings and thinning solvents	See Additional Special Term and Condition A.1.	
10.6 TPY OC for coating and thinning solvent usage and cleanup materials	10.6 TPY OC for coatings, thinning solvents, and cleanup materials	10.6 TPY OC for coatings, thinning solvents, and cleanup materials	See Additional Special Term and Condition A.1.	
See Additional Special Term and Condition A.1.	See Additional Special Term and Condition A.1.	See Additional Special Term and Condition A.1.	See Additional Special Term and Condition A.1.	
maximum daily coating and thinning solvent usage shall not exceed 8.0	maximum daily coating and thinning solvent usage shall not exceed 8.0	maximum daily coating and thinning solvent usage shall not exceed 8.0 gallons of coating and thinning solvent	55.4 lbs/day OC for coatings and thinning solvents	
			10.6 TPY OC for coatings, thinning solvents, and cleanup materials	

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	64.6

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.

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 **Akron Air Pollution control, 146**

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South High Street, Room 904, Akron, Ohio 44308.

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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010

A. Additional Terms and Conditions

1. The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

NONE

C. Monitoring and/or Record Keeping Requirements

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1. The permittee shall collect and record the following information each day for each coating line:
 - a. the name and identification number of each coating employed;
 - b. the initial volume of each coating in each dip chamber, in gallons;
 - c. the final volume of each coating in each dip chamber, in gallons;
 - d. the volume of each coating added to each dip chamber, in gallons;
 - e. the volume, in gallons, of each coating employed for each dip chamber (i.e., (b) minus (c) plus (d));
 - f. the OC content of each coating employed, in pounds per gallon;
 - g. the total volume, in gallons, of all of the coatings employed;
 - h. the name and identification number of each thinning solvent employed;
 - i. the volume, in gallons, of each thinning solvent employed;
 - j. the OC content of each thinning solvent employed, in pounds per gallon;
 - k. the total volume, in gallons, of all of the thinning solvents employed; and,
 - l. the total volume, in gallons, of all of the coatings and thinning solvents employed (i.e., (g) plus (k)).

2. The permittee shall calculate and record the following information each week for each coating line:
 - a. the total OC emissions from all coatings employed,

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in pounds per day (i.e., the sum of C.1.e times C.1.f for each coating);

- b. the total OC emissions from all thinning solvents employed, in pounds per day (i.e., the sum of C.1.i times C.1.j for each thinning solvent); and,
- c. the total OC emission rate from all of the coatings and thinning solvents employed, in pounds per day (i.e., (a) plus (b)).

The calculations shall be performed for each day that any of the coating lines were in operation.

- 3. The permittee shall collect and record the following information each month for each coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed; and,
 - d. the total OC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000).
- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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5. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall notify the Director (Akron Air Pollution Control) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Akron Air Pollution Control) within 45 days after the exceedance occurs.
2. For emissions units K001 through K006, the permittee shall submit deviation (excursion) reports which include an identification of each day during which the daily OC emissions exceeded 19.7 lbs/day, and the actual daily OC emissions for each such day.
3. For emissions units K007 through K010, the permittee shall submit deviation (excursion) reports which include an identification of each day during which the daily OC emissions exceeded 55.4 lbs/day, and the actual daily OC emissions for each such day.
4. The permittee shall also submit annual reports which specify the total OC emissions in tons per year from each emissions unit for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.
5. 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 Akron Air Pollution Control; and,

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- 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 Akron Air Pollution Control. 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.)

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E. Testing Requirements

1. Compliance with the emission limitation(s) in Emission Summary and in the Operational Restrictions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

For emissions units K001 through K006:

19.7 lbs/day OC

3.7 TPY OC

For emissions units K007 through K010:

55.4 lbs/day OC

10.6 TPY OC

Applicable Compliance Method

Recordkeeping of coating, thinning solvent and cleanup material usage and organic compound content of each coating, thinning solvent, and cleanup material. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings, thinning solvents, and cleanup materials.

F. Miscellaneous Requirements

1. If the emissions of any individual hazardous air pollutant or the emissions of total combined hazardous air pollutants exceed 10.0 tons per year or 25.0 tons per year, respectively, then the permittee shall apply for a Title V permit.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for

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emissions units K001 through K010. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Emissions Unit(s) ID	Pollutant	TLV (mg/m3)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	MAGLC (ug/m3)
K001-K006	acetone	1188	4.925	12580.0	28285.7
K007-K010	n-butyl alcohol	112	1.0	2395.0	2667.2
K007-K010	2-butoxy-ethanol	121	0.4	958.0	2881.0
K007-K010	ethyl benzene	434	1.2	2874.0	10333.3
K007-K010	naphthalene	52	0.4	958.0	1238.1
K007-K010	toluene	188	1.6	3832.0	4476.2
K007-K010	trimethyl benzene (CAS 25551-13-7)	123	0.8	1916.0	2928.6
K007-K010	xylene	434	2.0	4790.0	10333.3

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to

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be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

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- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.