Facility Name: **JS Enterprises Inc**
Application Number: **16-1831**
Date: **March 17, 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

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.

Facility Name: **JS Enterprises Inc**
Application Number: **16-1831**
Date: **March 17, 1999**

Facility Name: **JS Enterprises Inc**
Application Number: **16-1831**
Date: **March 17, 1999**

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 **JS Enterprises Inc** located in **Summit** 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	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	3745-21-09 (U)
K001	Binks paint booth	The permittee shall employ a filter to control particulate matter emissions. 3.0 pounds of VOC per gallon coating, excluding water and exempt solvents.	3745-31-05	
			3745-17-07	
			3745-17-11	

Facility Name: **JS Enterprises Inc**
Application Number: **16-1831**
Date: **March 17, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Permit Allowable Mass Emissions and/or Control/Usage Requirements	opacity as a six-minute average, except as provided by rule 0.551 pound/hour particulate matter (PM) 2.4 TPY PM			
2.4 pounds/hour volatile organic compounds (VOC) *1.66 TPY VOC/single HAP See the Additional Special Terms and Conditions 20 percent	3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents			

Facility Name: **JS Enterprises Inc**
Application Number: **16-1831**
Date: **March 17, 1999**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
*VOC/single HAP	1.66
PM	2.4

* All VOC emissions are considered to be HAP emissions.

CONSTRUCTION STATUS

The **Akron Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **K001 - Binks paint booth.**

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 South High Street, Room 904, Akron, OH 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

A. Additional Terms and Conditions

1. None.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 2760, based upon a rolling, 12-month summation of the coating usage figures.

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

Month(s)	Maximum Allowable Cumulative Coating Usage
1	230

1-2	460
1-3	690
1-4	920
1-5	1150
1-6	1380
1-7	1610
1-8	1840
1-9	2070
1-10	2300
1-11	2530
1-12	2760

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual

coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons per year for any single HAP and 24.9 tons per year of the combination of HAPs.

3. For the purpose of avoiding Title V, all VOC emissions are considered to be HAP emissions.

C. Monitoring and/or Recordkeeping Requirements

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

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

   b. the VOC content of each coating (excluding water and exempt solvents), as applied;

   c. the VOC content of each coating, as applied;

   d. the number of gallons of each coating employed in this emissions unit;

   e. the total number of gallons of all coatings employed in this emissions unit;

   f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the

coating usage figures;

g. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month;

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

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

j. the number of gallons of each cleanup material employed; and,

k. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

2. 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. <u>Reporting Requirements</u>

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.

2. The permittee shall notify the Director (the Akron Air Pollution Control) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Air Pollution Control) within 30 days following the end of the calendar month.

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

4. The permittee shall submit required reports in the following manner:

   a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Akron Air Pollution Control; and,

   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 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.)

E. Testing Requirements

1. Compliance with the emission limitations in the Emission Summary of this permit and the operational limitation in Section B.1 of the Additional Special Terms and Conditions shall be determined in accordance with the following methods:

   a. Emission Limitation

      2.4 pounds per hour of VOC

      Applicable Compliance Method

      Multiply the maximum hourly usage rate of coating by the VOC content in pound(s) of VOC per gallon of coating.

   b. Emission Limitation

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the VOC contents for all coatings employed in this emissions unit. The permittee shall obtain a Method 24 analysis of each coating employed in this emissions unit from the coating supplier or shall conduct a Method 24 for each coating employed in this emissions unit.

c. Emission Limitation

1.66 tons per year of VOC

Applicable Compliance Method

Monthly recordkeeping of the coating usage and VOC content as required by Section C.1 of the Additional Special Terms and Conditions.

d. Emission Limitation

0.551 lb/hr particulate matter

Applicable Compliance Method

E = P x S x (1-TE) x (1-CE)

where,

E = maximum particulate matter emissions rate (lb/hr);

P = maximum paint usage rate (gals/hr);

S = maximum solids content of paint (lbs/gal);

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 (TE = 0.25 for the coating application method used at this facility); and

CE = control efficiency of the control equipment (CE = 0.95 for this facility).

Future testing may be required in accordance with the requirements and procedures as specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation

20 percent opacity as a six-minute average

Applicable Compliance Method

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