State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08758

DATE: 9/18/2003

The Bron-Shoe Company
Dan Vance
1313 Alum Creek Dr
Columbus, OH 43209

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 9/18/2003**
Terms and Conditions	**Effective Date: 9/18/2003**

FINAL PERMIT TO INSTALL 01-08758

Application Number:	01-08758
APS Premise Number:	0125040248
Permit Fee:	**$400**
Name of Facility:	The Bron-Shoe Company
Person to Contact:	Dan Vance
Address:	1313 Alum Creek Dr Columbus, OH 43209

Location of proposed air contaminant source(s) [emissions unit(s)]:
1313 Alum Creek Dr
Columbus, **Ohio**

Description of proposed emissions unit(s):
Proshine Spray Booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

Pollutant	Tons Per Year
Toluene	2.0
Volatile Organic Compounds (VOC)	3.5

Emissions Unit ID: **K006**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Spray coating booth for metal refinishing and lacquering (ProShine)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.26 lbs/hr, excluding cleanup materials, and 3.5 tons/yr, including cleanup materials. See section A.2.a, A.2.b and A.2.c below. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii), OAC rule 3745-17-07(A)(1) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(2)(e)(iii)	The permittee shall not employ more than 10 gallons of coating per day for miscellaneous metal parts coating.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, from the booth stack, except as provided by rule.
	OAC rule 3745-35-07(B)	See sections A.2.c, B.1 and B2.

2. Additional Terms and Conditions

2.a The 3.26 lbs VOC/hr limitation for this emissions unit was established to reflect the maximum hourly potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with this

limit.

2.b Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

2.c The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of the Clean Air Act, from emissions unit R002, R003, K002, K003, K004, K005 and K006 shall not exceed 10 tons per year for an individual HAP and 25 tons per year for any combination of HAPs, per rolling, 12-month period.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 1,000 gallons.

2. The maximum toluene (HAP) content shall not exceed 4.0 lbs /gallon of coating applied.

3. The permittee shall operate the dry filtration system, whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day in which coatings were applied, for the purposes of determining the monthly VOC and HAP emission rate:

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

   b the number of gallons of each coating employed during the day;

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

   d. the individual HAP content (in pounds per gallon) of each coating employed; and

   e. the combined HAP content (in pounds per gallon) of each coating employed.

2. The permittee shall collect and record the following information for each month for the purpose of determining annual VOC and HAP emissions:

   a. a summation of the number of gallons of coating employed during the month from C.1.a and a summation of the number of gallons employed during the previous rolling, 12-month

period;

b. the name and number of gallons of each cleanup material employed;

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

d. the individual HAP content of each cleanup material, in pounds per gallon;

e. calculation of the individual monthly HAP emission rate (i.e., the sum of the products of the figures from items (1.b) and (1.d) for coatings and (2.b) and (2.d) for clean-up);

f. calculation of the total individual HAP emissions for each HAP for all coatings and cleanup materials employed, in pounds or tons per month and summation of rolling, 12-month individual HAP emission rate (summation of item (e) for the current month plus the previous 11-month emission rates, above); and

g. calculation of the total combined HAP emissions for all HAPs for all coatings and cleanup materials employed, in pounds or tons per month and summation of rolling, 12-month combined HAP emission rate (summation of item (f) for the current month plus the previous 11-month emission rate, above).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup 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 and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum
Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
TLV (mg/m3): 188.4
Maximum Hourly Emission Rate (lbs/hr): 1.85
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 560

MAGLC (ug/m3): 4,486

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 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 previously modeled;

b. Changes in the composition 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.).

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 (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 evaluations 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 is performed, a copy of the resulting computer model runs that

show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Central District Office in writing of the following:

   a. any daily record showing the use of more than 10 gallons of coatings per day; and

   b. any daily record showing that the 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 Central District Office within 30 days after the event occurs.

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports for the following:

   a. exceedance of the rolling, 12 -month coating usage restriction, as specified in section B.1 above; and

   b all exceedances of coating content restriction for toluene, as specified in section B.2 above.

   Each quarterly report shall include the date of each exceedance, the type of exceedance and the resultant increase in organic compound emissions, as well as any corrective actions that were taken to return to compliance.

3. The permittee shall submit annual reports which specify the individual and total HAP emissions from this emissions unit for the previous calendar year. The report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1 Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emissions Limitation:
   VOC emissions shall not exceed 3.26 pounds per hour, excluding cleanup material.

   Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based calculations of the maximum VOC content coating times the maximum application rate.
7.25 lbs VOC/gallon * 0.45 gallon/hr = 3.26 lbs VOC/hr

b. Emission Limitation:
VOC emissions shall not exceed 3.5 tons per year, including cleanup.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.2 above.
1,000 gal coating/yr * 7.0 lbs VOC/gal * 1 ton/2000 lb = 3.5 tons VOC/yr

c. Emission Limitation:
The coating usage for this emissions unit shall not exceed 1,000 gallons during any rolling, 12-month period.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2.a of this permit.

d. Emission Limitation:
The emissions of HAPs, as defined in Section 112(b) of the Clean Air Act, from emissions unit R002, R003, K002, K003, K004, K005 and K006 shall not exceed 10.0 tons per year for an individual HAP and 25 tons per year for any combination of HAPs, per rolling, 12-month period.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.2.f., above, of coatings per rolling,12-month period.

e. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the opacity limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9, as such appendix existed on July 1, 1996, and OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None