



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

10/28/2009

RICHARD COLBY
DAYTON-PHOENIX GROUP, INC.
1619 KUNTZ RD
DAYTON, OH 45404

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857041406
Permit Number: P0092849
Permit Type: Renewal
County: Montgomery

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.ohio.gov/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.ohio.gov/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: RAPCA

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
DAYTON-PHOENIX GROUP, INC.**

Facility ID: 0857041406
Permit Number: P0092849
Permit Type: Renewal
Issued: 10/28/2009
Effective: 10/28/2009
Expiration: 10/28/2019



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
DAYTON-PHOENIX GROUP, INC.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0092849
Facility ID: 0857041406
Effective Date: 10/28/2009

Authorization

Facility ID: 0857041406
Application Number(s): A0024311, A0038216
Permit Number: P0092849
Permit Description: PTIO renewal for metal part coating booths, varnish dip tanks, conformal coating and pryolsys burn off furnace
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/28/2009
Effective Date: 10/28/2009
Expiration Date: 10/28/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

DAYTON-PHOENIX GROUP, INC.
1619 KUNTZ ROAD
DAYTON, OH 45404

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0092849
Permit Description: PTIO renewal for metal part coating booths, varnish dip tanks, conformal coating and pryolsys burn off furnace

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID: K022
Company Equipment ID: Conformal Coating Booth
Superseded Permit Number: P0092851
General Permit Category and Type: Not Applicable

Emissions Unit ID: N001
Company Equipment ID: Burn-off oven
Superseded Permit Number: P0092842
General Permit Category and Type: Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	K006
Company Equipment ID:	Polane Paint Booth, Col. E-7
Superseded Permit Number:	P0092834
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K014
Company Equipment ID:	Motor Paint Booth-end line
Superseded Permit Number:	P0092840
General Permit Category and Type:	Not Applicable

Group Name: Varnish Tanks < 8 gallons/day

Emissions Unit ID:	K007
Company Equipment ID:	VT010 VT001 Dip Tanks, Col. R-14
Superseded Permit Number:	P0092835
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	VT007 Frame & Coil Dip Tank
Superseded Permit Number:	P0092836
General Permit Category and Type:	Not Applicable

Group Name: Varnish Tanks, compliant coating

Emissions Unit ID:	K009
Company Equipment ID:	Stator & Coil Dip Tank, Col. M-13
Superseded Permit Number:	08-04770
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K010
Company Equipment ID:	VT-004-1, Varnish Dip Tank
Superseded Permit Number:	08-04770
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule



3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

C. Emissions Unit Terms and Conditions



1. K022, Conformal Coating Booth

Operations, Property and/or Equipment Description:

Conformal Coating Process - circuit board coating

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3) through d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.64 lb/hour, 15.4 lbs/day and 2.80 tons per year (TPY).
b.	ORC 3704.03(F)(4)(c) OAC rule 3745-114	See d)(3) through d)(5).

(2) Additional Terms and Conditions

a. The 0.64 pound of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The coatings usage rate in this emissions unit shall not exceed 3.50 gallons per day.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The company identification of each coating, as applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds of VOC per gallon of coating, as applied.
 - d. The total VOC emissions from all coatings applied, in pounds per day, for this emission unit (the sum of d)(1)b. times d)(1)c. for each coating).
- (2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions from this emissions unit:
 - a. The total annual coating use, in gallons.
 - b. The total annual VOC emissions from all coating use, in tons.
- (3) The permit to install for this emissions unit (K022) was evaluated based on the actual materials (typically coatings) 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 SCREEN3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC) calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A". 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): 0.46

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 32

MAGLC (µg/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



- 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.).
- (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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (5) 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.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the:
- a. Coatings usage exceeded 3.5 gallons per day and the actual volume of coating used for the day;
 - b. VOC emissions exceeded 15.4 lbs/day and the actual VOC emissions for the day.
- The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit and shall include the annual VOC emissions, in tons, from this emissions unit.

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 0.64 lb/hour.

Applicable Compliance Method -

Compliance with the hourly allowable VOC emission limitation shall be determined by multiplying the maximum VOC content of all the coatings (4.39 lbs VOC/gallon) by the maximum hourly coatings usage rate (0.146 gallon/hr).

b. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 15.4 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in d)(1) and shall be determined by the daily coating usage in gallons, of each coating multiplied by its VOC content, in pounds per gallon.

c. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 2.80 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in d)(2) and shall be determined by the annual coating usage in gallons, of each coating multiplied by its VOC content, in pounds per gallon.

g) Miscellaneous Requirements

(1) The terms and conditions of this permit supersede the terms and conditions of PTI 08-04770 issued on August 8, 2006.



2. N001, Burn-off oven

Operations, Property and/or Equipment Description:

Controlled pyrolysis cleaning furnace

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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>The particulate emissions (PE) from this emissions unit shall not exceed 0.10 pound per 100 pounds of salvageable material charged.</p> <p>The PE from this emissions unit shall not exceed 0.04 tons per year.</p> <p>Visible PE from the stack serving this emissions unit shall not exceed 5 percent opacity as a six-minute average.</p> <p>Compliance with rule shall also include compliance with OAC rules 3745-17-07 and 3745-17-09.</p>
b.	OAC rule 3745-17-07(A)	The emissions limitations established by this rule are less stringent than the emissions limitations established according to OAC rule 3745-31-05(A)(3).



c.	OAC rule 3745-17-09(B)	The emissions limitations established by this rule are equivalent to the emissions limitations established according to OAC rule 3745-31-05(A)(3).
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(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated through the use of an afterburner with continuous temperature monitoring and recording equipment and compliance with the emissions limitations in b)(1).

c) Operational Restrictions

- (1) This emissions unit shall be installed, operated, and maintained in accordance with the manufacturers' specifications. This includes but is not limited to:

- a. during start-up, the temperature controller for the secondary combustion chamber shall be set to at least the minimum temperature recommended by the manufacturer, but not less than 1,400 °F; and
- b. The secondary combustion chamber temperature shall be maintained at least above the minimum temperature noted above during the entire pyrolysis cycle except for periods of time when the charge is inserted into the furnace. .

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the secondary combustion chamber temperature, in degrees Fahrenheit, during each pyrolysis cycle. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The monitoring devices shall be capable of accurately measuring the desired parameter.

- (2) The permittee shall maintain daily records of the following information for this emissions unit:

- a. for each charge, the temperature of the afterburner must be recorded just prior to the primary burner ignition;
- b. the weight of each charge;
- c. the amount of time needed to complete pyrolysis for each charge; and
- d. a log of the time and date the part are removed from the furnace.

- (3) The permittee shall maintain a log of all periods of time when the emissions unit is in operation and the secondary combustion chamber temperature was less than 1,400 °F.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA, District Office or local air agency) in writing of any record of deviation of the secondary combustion chamber temperature below 1,400 °F. The notification shall include a copy of such record, including any corrective action(s) taken, and shall be sent to the Director (the appropriate Ohio EPA, district Office or local air agency) within 45 days after the deviation occurs.
- (2) The permittee shall identify the following information in the annual permit evaluation report (PER) in accordance with the monitoring requirements in d)(1) through d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions; and
 - c. The total annual days of operation for the previous calendar year.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation -

PE shall not exceed 0.10 pound per 100 pounds of salvageable material charged to the furnace.

Applicable Compliance Method -

If requested, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(8).

b. Emission Limitation -

The PE from this emissions unit shall not exceed 0.04 TPY.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly PE rate (0.10 pound per 100 pounds of material charged to the incinerator) by the maximum furnace capacity (10 lbs/hr) by 8,760 hours/yr and dividing by 2,000 lbs/ton.

c. Emission Limitation -

Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method -

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) The terms and conditions of this permit supersede the terms and conditions of PTI 08-4041 issued on June 30, 1999.



3. Emissions Unit Group - Paint Booths: K006, K014,

EU ID	Operations, Property and/or Equipment Description
K006	Miscellaneous metal parts coating booth that uses less than 8 gallons of coating per day with water wash; Polane Paint Booth, Col. E-7.
K014	Miscellaneous Metal Parts Paint Booth that uses less than 8 gallons of coating per day, with water wash; Motor Paint Booth-end frame.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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><u>Emissions Unit K006:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.50 tons per year (TPY).</p> <p>The volume of coatings applied in this emissions unit shall not exceed 5 gallons per day.</p> <p><u>Emissions Unit K014:</u> The VOC emissions from this emissions unit shall not exceed 6.40 TPY.</p> <p>The volume of coatings applied in this emissions unit shall not exceed 8 gallons per day.</p>
b.	OAC rule 3745-21-09(U)(2)(e)	The emissions limitations of this are equivalent or less stringent than the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions limitations established according to OAC rule 3745 -31-05(A)(3).

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (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 volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
 - (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a times d)(2)b for each individual coating applied; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., d)(2)a times d)(2)b. for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c and d)(2)g.



These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit and shall include the annual VOC emissions, in tons, from each emissions unit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation -

The VOC emissions shall not exceed 3.50 TPY from emissions unit K006 and 6.40 TPY from K014.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in d)(2) and shall be determined by the annual coating usage in gallons, of each coating multiplied by its VOC content, in pounds per gallon.

g) Miscellaneous Requirements

- (1) The terms and conditions of this permit supersede the terms and conditions of PTI 08-0811 issued on October 23, 1985.



5. Emissions Unit Group - Varnish Tanks < 8 gallons/day: K007, K008,

EU ID	Operations, Property and/or Equipment Description
K007	Miscellaneous metal parts coating tank, varnish dip tank that uses less than 8 gallons of coating per day.
K008	Miscellaneous metal parts coating tank, varnish dip tank that uses less than 8 gallons of coating per day.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	<u>Emissions Unit K007:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8.30 tons per year (TPY). <u>Emissions Unit K008:</u> The VOC emissions from this emissions unit shall not exceed 8.40 TPY.
b.	OAC rule 3745-21-09(U)(2)(e)	The permittee shall not employ more than eight gallons of coating per day for the miscellaneous metal parts and products coating line.

(2) Additional Terms and Conditions

a. None.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (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 volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
 - (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each or the maximum VOC content for any coating applied, in pounds per gallon;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a times d)(2)b for each individual coating applied; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., d)(2)a times d)(2)b. for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- e) Reporting Requirements
 - (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.



(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit and shall include the annual VOC emissions, in tons, from this emissions unit.

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation -

The VOC emissions shall not exceed 8.30 TPY from emissions unit K007 and 8.40 TPY from K008.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in d)(2) and shall be determined by the annual coating usage in gallons, of each coating multiplied by its VOC content, in pounds per gallon.

g) Miscellaneous Requirements

(1) The terms and conditions of this permit supersede the terms and conditions of PTI 08-0811 issued on October 23, 1985.



6. Emissions Unit Group - Varnish Tanks, Compliant Coating: K009, K010,

EU ID	Operations, Property and/or Equipment Description
K009	Miscellaneous metal parts coating tank, varnish dip tank VT-006
K010	Miscellaneous metal parts coating tank, varnish dip tank VT-004-1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(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. 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><u>Emissions Unit K009:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 41.6 pounds per day and 7.60 tons per year (TPY).</p> <p>See b)(2)a. and b)(2)b.</p> <p><u>Emissions Unit K010:</u> The VOC emissions from this emissions unit shall not exceed 49.4 pounds per day and 9.02 TPY.</p> <p>See b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-21-09(U)(1)(d)	The emissions limitations established by this rule are less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The VOC content of the coatings applied in each emissions unit shall not exceed 1.3 lbs VOC/gallon, excluding water and exempt solvents.
- b. The 41.6 lbs VOC /day limitation for emissions unit K009 and 49.4 lbs VOC /day limitation for emissions unit K010 were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for each coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.



This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in each emissions unit:
- a. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;
 - b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a times d)(2)b for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., “a” times “b” for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of d)(2)e times d)(2)f for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source



identified in this permit and shall include the annual VOC emissions, in tons, from each emissions unit.

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC emissions from emissions unit K009 shall not exceed 41.6 pounds/day.

Applicable Compliance Method:

Compliance shall be based upon the maximum daily coating application rate (32 gallons per day) multiplied by the maximum VOC content of the coatings applied (1.3 lbs VOC/gallon).

b. Emissions Limitation:

The VOC emissions from emissions unit K010 shall not exceed 49.4 pounds/day.

Applicable Compliance Method:

Compliance shall be based upon the maximum daily coating application rate (38 gallons per day) multiplied by the maximum VOC content of the coatings applied (1.3 lbs VOC/gallon).

c. Emissions Limitation:

The VOC emissions from emissions unit K009 shall not exceed 7.60 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

d. Emissions Limitation:

The VOC emissions from emissions unit K010 shall not exceed 9.02 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

e. Emission Limitation:

The VOC content of the coatings applied in this emissions unit shall not exceed 1.3 lbs VOC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements of d)(1) and manufacturer coating formulation data. If requested, the VOC content shall be



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0092849

Facility ID: 0857041406

Effective Date: 10/28/2009

determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The terms and conditions of this permit supersede the terms and conditions of PTI 08-04770 issued on August 8, 2006.