



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
MADISON COUNTY  
Application No: 01-07415  
Fac ID: 0149000089**

**CERTIFIED MAIL**

**DATE: 2/23/2006**

Stanley Electric US Company Inc  
Raefield Watkins  
420 E High St  
London, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO

**MADISON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-07415 FOR AN AIR CONTAMINANT SOURCE FOR  
Stanley Electric US Company Inc**

On 2/23/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Stanley Electric US Company Inc**, located at **420 E High Street, London, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-07415:

**Modification of 2 spray booths**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417  
[(614)728-3778]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 01-07415**

Application Number: 01-07415  
Facility ID: 0149000089  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Stanley Electric US Company Inc  
Person to Contact: Raefield Watkins  
Address: 420 E High St  
London, OH 43140

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**420 E High Street  
London, Ohio**

Description of proposed emissions unit(s):  
**Modification of 2 spray booths**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

---

Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit-To-Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

**Issued: To be entered upon final issuance**

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

**2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

**3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

**Stanley Electric US Company Inc**

**Facility ID: 0149000089**

**PTI Application: 01-07415**

**Issued: To be entered upon final issuance**

permittee shall comply with the requirement to register such a plan.

**4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the

**Stanley Electric US Company Inc**

**Facility ID: 0149000089**

**PTI Application: 01-07415**

**Issued: To be entered upon final issuance**

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

**Stanley Electric US Company Inc**

**Facility ID: 0149000089**

**PTI Application: 01-07415**

**Issued: To be entered upon final issuance**

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

**Issued: To be entered upon final issuance**

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

**11. 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.

**12. Air Pollution Nuisance**

**Stanley Electric US Company Inc**

**PTI Application: 01-07415**

**Issued: To be entered upon final issuance**

**Facility ID: 0149000089**

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.

**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

**B. State Only Enforceable Permit-To-Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit 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 of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. 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.

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

**6. 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.

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. 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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	15.52
NOx	3.02
SO2	0.018
CO	2.50
PE	0.22

**Stanley Electric US Company Inc**  
**PTI Application: 01-07415**  
**Issued: To be entered upon final issuance**

**Facility ID: 0149000089**

Stank

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. The permittee is subject to the rules of the Subpart IIII MACT standard as an existing major source with a compliance date as specified in the final standard. As specified in the Subpart, the permittee shall submit the following notifications:
  - a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
    - i. the name and mailing address of the permittee;
    - ii. the physical location of the source if it is different from the mailing address;
    - iii. identification of the relevant MACT standard and the source's compliance date;
    - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
    - v. a statement confirming the facility is a major source for HAPs.
  - b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
    - i. the methods used to determine compliance;
    - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

Stank

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

- iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;
- v. an analysis demonstrating whether the affected source is a major source or an area source;

**Stanley Electric US Company Inc**  
**PTI Application: 01-07415**  
**Issued: To be entered upon final issuance**

**Facility ID: 0149000089**

Stanle

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Stanle

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
R022 - Spraybooth with 1 infrared oven and 1 UV oven with dry filtration and thermal incinerator (modification of PTI 01-7415, issued January 21, 1999)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)

Stanley

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

	Applicable Emissions <u>Limitations/Control Measures</u>	
OAC rule 3745-21-08(B)		
OAC rule 3745-23-06(B)		The emissions of OC from this emissions unit shall not exceed 7.60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
MACT - 40 CFR Part 63, Subpart PPPP	The permittee shall control organic compound (OC) emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum destruction and removal efficiency of 95%.	See Sections A.II.1 and A.II.2 below.
	OC emissions shall not exceed 2.40 lbs/hr.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Particulate emissions (PE) shall not exceed 0.28 lb/hr and 1.23 tons/yr.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Emissions from natural gas usage in the incinerator and drying ovens from R022 and R023 combined shall not exceed:	Visible particulate emissions shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule.
	0.69 lb NOx/hr,	See Section A.I.2.b below.
	3.02 tons NOx/yr;	See Section A.I.2.c below.
	0.004 lb SO2/hr,	
	0.018 ton SO2/yr;	See Section II.A.1 of the Facility Specific Terms and Conditions for this permit.
	0.56 lb CO/hr,	
	2.50 tons CO/yr;	
	0.05 lb PE/hr,	
	0.22 ton PE/yr;	
	0.07 lb OC/hr, and	
	0.32 ton OC/yr.	
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-17-07(A).	

Stanle

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

- 2.a** The PE and natural gas combustion emission limitations are based on the emissions units' potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these emission limitations.
- 2.b** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan

Emissions Unit ID: R022

(SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The permittee shall satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 57,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 3,600 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.
3. The permittee shall control the OC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum destruction and removal efficiency of 95%. The PTE shall be maintained under negative pressure, at a minimum differential pressure that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
5. The permittee has the option to perform an additional demonstration to show that the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained

Emissions Unit ID: R022

under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified (Sections A.II.3, A.III.4 and A.IV.1.e) to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (Sections A.II.3, A.III.4 and A.IV.1.e) to ensure the ongoing integrity of the PTE.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and each cleanup material employed;
  - c. the total gallons of all coatings and total gallons of all cleanup materials employed;
  - d. the OC content of each coating and cleanup material, in pounds per gallon;
  - e. the PE content of each coating, in pounds per gallon;
  - f. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
  - g. the total OC emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
  - h. the total OC emission rate for all coatings and cleanup materials when using a photochemically reactive material, in pounds per day for the emissions unit;

Emissions Unit ID: R022

- i. the total number of hours the emissions unit was in operation; and
- j. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (g)/(i), in pounds per hour (average).

Stank

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

2. The permittee shall maintain monthly records of the following information:
  - a. the rolling, 12-month summation of the coating usage, in gallons;
  - b. the rolling, 12-month summation of the cleanup material usage (less any cleanup material sent off-site for recycle, recovery, and/or disposal) in gallons; and
  - c. the rolling, 12-month summation of OC emissions from coating and cleanup usage, in pounds or tons.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
4. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R022. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

5. The permittee shall maintain daily records that document any time periods when the dry

Stanle

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

filtration system was not in service when the emissions unit was in operation.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

Stanley

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

- a. all exceedances of the rolling, 12-month coating usage limitation;
- b. all exceedances of the rolling, 12-month cleanup material usage limitation;
- c. all exceedances of the rolling, 12-month OC emission limitation of 7.6 tons;
- d. all days during which the average hourly OC emission rate from coatings and cleanup materials exceeded the limit contained in Section III.A.I. above, and the actual average OC emission rate for each such day;
- e. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per U.S. EPA Test Method 204, when the emissions unit was in operation;
- f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance (when the emissions unit was in operation); and
- g. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when emissions unit was in operation.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of 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 Ohio EPA, Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total OC and PE emissions for the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

**V. 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. Emission Limitation:  
OC emissions shall not exceed 2.40 lbs/hr.

**Stanley Electric US Company Inc**  
**PTI A**  
**Issue**

**Facility ID: 0149000089**

Emissions Unit ID: R022

**Applicable Compliance Method:**

Compliance with the hourly limitation shall be determined through daily record keeping as specified in Section A.III.1. Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

Stanle

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

- b. Emission Limitation:  
PE shall not exceed 0.28 lb/hr and 1.23 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum PE content of the coating used in the source (2 lbs PE/gallon of coating) by the coating's maximum usage in any hour (8 gallons) and crediting for transfer and control efficiency using the following calculations:

PE emissions/hr =(maximum PE content of coating) x (maximum coating usage in one hour) x (1-TE\*) x (1-CE\*\*)

\* TE= transfer efficiency (65% for electrostatic application)

\*\* CE= capture efficiency (95% for dry filtration control)

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- c. Emission Limitations:  
Emissions from natural gas usage in the incinerator and drying ovens from R022 and R023 combined shall not exceed:

0.69 lb NO<sub>x</sub>/hr and 3.02 tons NO<sub>x</sub>/yr;  
0.004 lb SO<sub>2</sub>/hr and 0.018 ton SO<sub>2</sub>/yr;  
0.56 lb CO/hr and 2.50 tons CO/yr;  
0.05 lb PE/hr and 0.22 ton PE/yr; and  
0.07 lb OC/hr and 0.32 ton OC/yr.

Applicable Compliance Method:

These hourly limits were established by multiplying the maximum total hourly natural gas usage of the incinerator and drying ovens (6,640 ft<sup>3</sup>/hr) by the following emission factor for each pollutant:

<u>Pollutant</u>	<u>Emission Factor</u>
NO <sub>x</sub>	100 lb of NO <sub>x</sub> /10 <sup>6</sup> ft <sup>3</sup>
SO <sub>2</sub>	0.6 lb of SO <sub>2</sub> /10 <sup>6</sup> ft <sup>3</sup>
CO	84 lb of CO/10 <sup>6</sup> ft <sup>3</sup>
PE	7.6 lb of PE/10 <sup>6</sup> ft <sup>3</sup>
OC	11 lb of OC/10 <sup>6</sup> ft <sup>3</sup>

Stanle

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

All emission factors are found in U.S. EPA, AP 42, Compilation of Air Pollutant Emission Factors, Tables 1.4-1 and 1.4-2 for Natural Gas Combustion (7/98).

Stank

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- d. Emission Limitation:  
OC emissions shall not exceed 7.60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with this emission limitation may be determined through the record keeping required by Section A.III.2.c above.

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- f. Usage Limitations:  
57,000 gallons of coating per rolling, 12-month period  
3,600 gallons of cleanup materials per rolling, 12-month period

Applicable Compliance Method:

Compliance with these usage limitations may be determined through the record keeping required by Section A.III.2.a and A.III.2.b above.

- g. Emission Limitation:  
Use of a PTE and thermal incinerator with a minimum destruction and removal efficiency of 95%.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PTE and the destruction removal efficiency through an emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25, or 25A and Method 204. Alternative U.S. EPA-approved test methods may be used with prior approval from the

**Stanley Electric US Company Inc**  
**PTI A**  
**Issue**

**Facility ID: 0149000089**

Emissions Unit ID: R022

Ohio EPA.

**VI. Miscellaneous Requirements**

None

Stanley

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R022 - Spraybooth with 1 infrared oven and 1 UV oven with dry filtration and thermal incinerator (modification of PTI 01-7415, issued January 21, 1999)	Ohio Air Toxic Policy	See Section B.III below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual 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" pollutants:

Stanley

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

Pollutant: n-Butyl Alcohol

TLV: 152,000 ug/m<sup>3</sup>

Maximum Hourly Emission Rate: 2.40 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2789 ug/m<sup>3</sup>:

MAGLC: 3,619 ug/m<sup>3</sup>

2. 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, 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.).
3. 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.

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

**Stanley Electric US Company Inc**

**PTI A**

**Issue**

**Facility ID: 0149000089**

Emissions Unit ID: R022

pollutants emitted, change in stack/exhaust parameters, etc.);

Stanle

PTI A

Emissions Unit ID: R022

**Issued: To be entered upon final issuance**

- 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Stanley

PTI A

Emissions Unit ID: R023

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
R023 - Spraybooth with 1 infrared oven and 1 ultraviolet oven with dry filtration and a thermal incinerator (modification of PTI 01-7415, issued January 21, 1999)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)
	OAC rule 3745-21-08(B)
	OAC rule 3745-23-06(B)
	MACT - 40 CFR Part 63, Subpart PPPP
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)

Stanley

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

<u>Applicable Emissions Limitations/Control Measures</u>	
The permittee shall control organic compound (OC) emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum destruction and removal efficiency of 95%. OC emissions shall not exceed 2.40 lbs/hr.	3745-17-07(A). The emissions of OC from this emissions unit shall not exceed 7.60 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See Sections A.II.1 and A.II.2 below.
Particulate emissions (PE) shall not exceed 0.28 lb/hr and 1.23 tons/yr.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Emissions from natural gas usage in the incinerator and drying ovens from R022 and R023 combined shall not exceed:	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.69 lb NOx/hr, 3.02 tons NOx/yr; 0.004 lb SO2/hr, 0.018 ton SO2/yr;	Visible particulate emissions shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule. See Section A.I.2.b below.
0.56 lb CO/hr, 2.50 tons CO/yr;	See Section A.I.2.c below.
0.05 lb PE/hr, 0.22 ton PE/yr; 0.07 lb OC/hr, and 0.32 ton OC/yr.	See Section II.A.1 of the Facility Specific Terms and Conditions for this permit.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and	

**2. Additional Terms and Conditions**

- 2.a** The PE and natural gas combustion emission limitations are based on the emissions units' potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these emission limitations.
- 2.b** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC

Stanley

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The permittee shall satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

**II. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 57,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 3,600 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.
3. The permittee shall control the OC emissions from this emissions unit through the use

Stank

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

of a permanent total enclosure (PTE) and a thermal incinerator with a minimum destruction

Stank

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

and removal efficiency of 95%. The PTE shall be maintained under negative pressure, at a minimum differential pressure that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emissions unit is in operation.

4. The average combustion temperature of the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature recorded during the most recent emission test that demonstrated the emissions unit was in compliance.
5. The permittee has the option to perform an additional demonstration to show that the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified (Sections A.II.3, A.III.4 and A.IV.1.e) to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (Sections A.II.3, A.III.4 and A.IV.1.e) to ensure the ongoing integrity of the PTE.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and each cleanup material employed;
  - c. the total gallons of all coatings and total gallons of all cleanup materials employed;

Emissions Unit ID: R023

- d. the OC content of each coating and cleanup material, in pounds per gallon;
  - e. the PE content of each coating, in pounds per gallon;
  - f. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
  - g. the total OC emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
  - h. the total OC emission rate for all coatings and cleanup materials when using a photochemically reactive material, in pounds per day for the emissions unit;
  - i. the total number of hours the emissions unit was in operation; and
  - j. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (g)/(i), in pounds per hour (average).
2. The permittee shall maintain monthly records of the following information:
- a. the rolling, 12-month summation of the coating usage, in gallons;
  - b. the rolling, 12-month summation of the cleanup material usage (less any cleanup material sent off-site for recycle, recovery, and/or disposal) in gallons; and
  - c. the rolling, 12-month summation of OC emissions from coating and cleanup usage, in pounds or tons.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the

Stanley

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

most recent emission test that demonstrated the emissions unit was in compliance; and

- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
4. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R023. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

5. 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.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
  - a. all exceedances of the rolling, 12-month coating usage limitation;
  - b. all exceedances of the rolling, 12-month cleanup material usage limitation;
  - c. all exceedances of the rolling, 12-month OC emission limitation of 7.6 tons;
  - d. all days during which the average hourly OC emission rate from coatings and cleanup materials exceeded the limit contained in Section III.A.I. above, and the actual average OC emission rate for each such day;
  - e. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per U.S. EPA Test Method 204, when the emissions unit was in operation;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the

Emissions Unit ID: R023

average temperature during the most recent performance test that demonstrated the emissions unit was in compliance (when the emissions unit was in operation); and

- g. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when emissions unit was in operation.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

- 2. The permittee shall notify the Ohio EPA, Central District Office in writing of 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 Ohio EPA, Central District Office within 30 days after the event occurs.
- 3. The permittee shall submit annual reports of the total OC and PE emissions for the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

**V. 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. Emission Limitation:  
OC emissions shall not exceed 2.40 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly limitation shall be determined through daily record keeping as specified in Section A.III.1. Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

- b. Emission Limitation:  
PE shall not exceed 0.28 lbs/hr and 1.23 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum PE content of the coating used in the source (2 lbs PE/gallon of coating) by the coating's usage in any hour (8 gallons/hr) and crediting for transfer and control efficiency using the following calculations:

Stanley

PTI A

Emissions Unit ID: R023

Issued: To be entered upon final issuance

PE emissions/hr =(maximum PE content of coating) x (maximum coating usage in one hour) x (1-TE\*) x (1-CE\*\*)

\* TE= transfer efficiency (65% for electrostatic application)

\*\* CE= capture efficiency (95% for dry filtration control)

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

c. Emission Limitations:

Emissions from natural gas usage in the incinerator and drying ovens from R022 and R023 combined shall not exceed:

0.69 lb NOx/hr and 3.02 tons NOx/yr;  
0.004 lb SO2/hr and 0.018 ton SO2/yr;  
0.56 lb CO/hr and 2.50 tons CO/yr;  
0.05 lb PE/hr and 0.22 ton PE/yr;  
0.07 lb OC/hr and 0.32 ton OC/yr.

Applicable Compliance Method:

These hourly limits were established by multiplying the maximum total hourly natural gas usage of the incinerator and drying ovens (6,640 ft<sup>3</sup>/hr) by the following emission factor for each pollutant:

<u>Pollutant</u>	<u>Emission Factor</u>
NOx	100 lb of NOx/10 <sup>6</sup> ft <sup>3</sup>
SO2	0.6 lb of SO2/10 <sup>6</sup> ft <sup>3</sup>
CO	84 lb of CO/10 <sup>6</sup> ft <sup>3</sup>
PE	7.6 lb of PE/10 <sup>6</sup> ft <sup>3</sup>
OC	11 lb of OC/10 <sup>6</sup> ft <sup>3</sup>

All emission factors are found in U.S. EPA, AP 42, Compilation of Air Pollutant Emission Factors, Tables 1.4-1 and 1.4-2 for Natural Gas Combustion (7/98).

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

d. Emission Limitation:

Emissions Unit ID: R023

OC emissions shall not exceed 7.60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with this emission limitation may be determined through the record keeping required by Section A.III.2.c above.

e. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Usage Limitations:

57,000 gallons of coating per rolling, 12-month period

3,600 gallons of cleanup materials per rolling, 12-month period

Applicable Compliance Method:

Compliance with these emission limitations may be determined through the record keeping required by Section A.III.2.a and A.III.2.b above.

g. Emission Limitation:

Use of a PTE and thermal incinerator with a minimum destruction and removal efficiency of 95%.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PTE and the destruction removal efficiency through an emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25, or 25A and Method 204. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

None

Stanley

PTI A

Emissions Unit ID: R023

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R023 - Spraybooth with 1 infrared oven and 1 ultraviolet oven with dry filtration and a thermal incinerator (modification of PTI 01-7415, issued January 21, 1999)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual 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" pollutants:

Stanley

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

Pollutant: n-Butyl Alcohol

TLV: 152,000 ug/m<sup>3</sup>

Maximum Hourly Emission Rate: 2.40 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2789 ug/m<sup>3</sup>:

MAGLC: 3,619 ug/m<sup>3</sup>

2. 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, 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.).
3. 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.

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

**Stanley Electric US Company Inc**

**PTI A**

**Issue**

**Facility ID: 0149000089**

Emissions Unit ID: R023

pollutants emitted, change in stack/exhaust parameters, etc.);

Stanle

PTI A

Emissions Unit ID: R023

**Issued: To be entered upon final issuance**

- 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None