



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

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

Re: Permit to Install  
Montgomery County ✓  
Application No: 08-3736

CERTIFIED MAIL

RECEIVED

January 7, 1998

JAN 15 1998

WESTWOOD FINISHING COMPANY  
MIKE CONKLIN  
5881 WOLF CREEK PIKE  
TROTWOOD, OH 45426

REGIONAL AIR POLLUTION  
CONTROL AGENCY

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations & Permit Section  
Division of Air Pollution Control

cc: US EPA  
REGIONAL AIR POLLUTION CONTROL

George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director



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## Permit to Install Terms and Conditions

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Application No. 08-3736  
APS Premise No. 0857153083  
Permit Fee: \$800.00

Name of Facility: WESTWOOD FINISHING COMPANY

Person to Contact: MIKE CONKLIN

Address: 5881 WOLF CREEK PIKE  
TROTWOOD, OH 45426

Location of proposed source(s): 5881 WOLF CREEK PIKE  
TROTWOOD, OHIO

Description of proposed source(s):  
CONVEYER BOOTH AND BATCH BOOTH; MISCELLANEOUS METAL PARTS.

Date of Issuance: January 7, 1998

Effective Date: January 7, 1998

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**TERMINATION OF PERMIT TO INSTALL**

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

**NOTICE OF INSPECTION**

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

**CONSTRUCTION OF NEW SOURCES**

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

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

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

**PERMIT TO INSTALL FEE**

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

**PUBLIC DISCLOSURE**

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

**APPLICABILITY**

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

**BEST AVAILABLE TECHNOLOGY**

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

**PERMIT TO OPERATE APPLICATION**

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

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

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

**AIR EMISSION SUMMARY**

The air contaminant sources listed below comprise the Permit to Install for WESTWOOD FINISHING COMPANY located in Montgomery County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K005	Conveyor booth #5, miscellaneous metal parts	*	3745-31-05 3745-21-09 (U) (1) (c)	333 lbs/month, 2.0 tons/yr including cleanup of volatile organic compounds; coatings not to exceed 3.5 lbs VOC/gallon, minus water and exempt solvents
K006	Batch booth #1, miscellaneous metal parts	*	3745-31-05 3745-21-09 (U) (1) (c)	166 lbs/month, 1.0 ton/yr including cleanup of volatile organic compounds; coatings not to exceed 3.5 lbs VOC/gallon, minus water and exempt solvents

\* Compliance with applicable OAC rules and specified allowable emission rates; recordkeeping and reporting requirements.

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	3.0

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**I. Emissions Units K005 and K006**

**A. Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the conveyor booth number 5 and batch booth number 1:
  - a. the name and identification number of each coating as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;

- c. the number of gallons (excluding water and exempt solvents) of each coating employed;
- 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; and,
- g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

**B. VOC Content Requirements**

1. The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 3.5 pounds per gallon, less water and exempt solvents as applied.

**C. Reporting Requirements**

1. The permittee shall notify the Director (Regional Air Pollution Control 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 (Regional Air Pollution Control Agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify each month during which the total VOC emissions exceeded 333 pounds (K005) and 166 pounds (K006), and the actual VOC emission rates for that month.
3. USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**D. Compliance Methods**

1. K005

a. Emission Limitation

333 pounds VOC/month including cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping as specified in section I.A.1.

b. Emission Limitation

2.0 tons VOC/year including cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping as specified in section I.A.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

2. K006

a. Emission Limitation

166 pounds VOC/month including cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping as specified in section I.A.1.

b. Emission Limitation

1.0 ton VOC/year including cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping as specified in section I.A.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.