



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
Clark County ✓
Application No: 08-3689

CERTIFIED MAIL

RECEIVED

AUG - 6 1997

REGIONAL AIR POLLUTION
CONTROL AGENCY

July 30, 1997

WESPATT, INC.
NICK LUBBERS
1940 SOUTH YELLOW SPRINGS
SPRINGFIELD, OH 45506

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



Permit to Install Terms and Conditions

Application No. 08-3689
APS Premise No. 0812100543
Permit Fee: \$200.00

Name of Facility: WESPATT, INC.

Person to Contact: NICK LUBBERS

Address: 1940 SOUTH YELLOW SPRINGS
SPRINGFIELD, OH 45506

Location of proposed source(s): 1940 SOUTH YELLOW SPRINGS
SPRINGFIELD, OHIO

Description of proposed source(s):
PAINT SPRAY BOOTH FOR COATING OF MISCELLANEOUS METAL PARTS.

Date of Issuance: July 30, 1997

Effective Date: July 30, 1997

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)

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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 WESPATT, INC. located in Clark 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 & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Miscellaneous metal parts paint spray booth	*	3745-31-05 3745-21-09 (U) (2) (e) (i)	14.43 lbs/day excluding cleanup and 3.28 tons/yr including cleanup of volatile organic compounds; less than or equal to 3 gallons per day coating usage.

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

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Compound	3.28

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. K001

1. Usage Limitation

- a. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons.
- b. The maximum annual cleanup usage for this emissions unit shall not exceed 182.50 gallons.

2. Recordkeeping/Reporting requirements

- a. The permittee shall collect and record the following information each day for the coating operation:
 - i. the company identification for each coating employed;
 - ii. the volume, in gallons of each coating employed;
 - iii. the VOC content of each coating, as applied, in pounds per gallon; and,
 - iv. the total VOC emissions from all coatings employed, in pounds per day.
- b. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - i. the name and identification of each cleanup material employed;
 - ii. the number of gallons of each cleanup material employed;
 - iii. the VOC content of each cleanup material, in pounds per gallon; and,
 - iv. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

- c. The permittee shall notify the Director (Regional Air Pollution Control Agency) in writing of any daily record that the coating line employs more than the applicable maximum daily coating usage limit and any annual record that the coating line employs more than the applicable maximum annual cleanup usage limit. The notification shall include a copy of such records and shall be sent to the Director (Regional Air Pollution Control Agency) within 30 days after the exceedance occurs.
- d. 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.

3. Compliance Method:

- a. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation-

14.43 pounds/day of volatile organic compounds excluding cleanup

Applicable Compliance Method-

Compliance shall be based on the daily recordkeeping specified in the terms and conditions No. 2.a.

Emission Limitation-

3.28 tons/yr volatile organic compounds including cleanup

Applicable Compliance Method-

Compliance shall be based on the annual recordkeeping specified in the terms and conditions No. 2.b.