



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION

CERTIFIED MAIL

LAKE COUNTY

Application No: 02-04672

DATE: 8/24/2000

Aexcel Corporation
M George Damico
7373 Production Dr PO Box 780
Mentor, OH 44060

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Very truly yours,

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/24/2000
Effective Date: 8/24/2000**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-04672

Application Number: **02-04672**
APS Premise Number: **0243081231**
Permit Fee: **\$0**
Name of Facility: **Aexcel Corporation**
Person to Contact: **M George Damico**
Address: **7373 Production Dr PO Box 780
Mentor, OH 44060**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7373 Production Dr
Mentor, OHIO**

Description of modification:
Modification of PTI 02-4672 issued 1/5/95 to accurately reflect emissions for equipment actually installed increasing allowable emission rates for P001-P010 (PM) & for P001 and P002(Pb).

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

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GENERAL PERMIT CONDITIONS

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.

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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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Aexcel Corporation** located in **LAKE** County. The emissions units 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.

			T004	T013
Ohio EPA Source Number	P004		T005	T014
P001		P008	T006	T015
			T007	T016
	P004 (cont'd)		T008	T017
	P005	P009	T009	T018
P002			T010	T019
	P006	T001		T020
		T002	T011	
P003				T021
		T003	T012	
	P007			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T022			Tank 10002 10,000 gal. Naphtha	Tank 8505 8,500 gal. Resin
T023	<u>Source Identification Description</u>	<u>Industrial Paint Disperser #5; 60 HP Cowles</u>	Tank 6001 6,000 gal. Lacolene	Tank 8506b 8,500 gal. Resin
	Traffic Paint Disperser #1; 100 HP Hockmeyer		Tank 6002 6,000 gal. Toluene	Tank 8507 8,500 gal. Empty
		<u>Industrial Paint Disperser #6; 50 HP Hockmeyer</u>	Tank 6003 6,000 gal. Xylene	Tank 8508 8,500 gal. Empty
	Traffic Paint Disperser #2; 100 HP Hockmeyer	<u>Industrial Paint Disperser #7; 50 HP Hockmeyer</u>	Tank 6004 6,000 gal. MIBK	Tank 8509 8,500 gal. Resin
		<u>Industrial Paint Disperser #8; 25 HP Cowles</u>	Tank 6005a 3,000 gal. Naphtha	Tank 8510 8,500 gal. Oil Alkyd
	Traffic Paint Disperser #3; 60 HP Hockmeyer		Tank 6005b 3,000 gal. n-butyl Naphtha	Tank 5011 5,000 gal. Paraffin
		<u>Industrial Paint Disperser #9; 15 HP Hockmeyer</u>	Tank 6006a 3,000 gal. MEK	Tank 8512 8,500 gal. Resin
			Tank 6006b 3,000 gal. butyl Cellosolve	Tank 8513 8,500 gal. Styrene
			Tank 8501 8,500 gal. Urethane	
			Tank 8502 8,500 gal. Resin	
	Industrial Paint Disperser #4; 50 HP Hockmeyer		Tank 8503 8,500 gal. Resin	
		Tank 10001 10,000 gal. Toluene	Tank 8504 8,500 gal. Castor Oil	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	of fabric filter; keep dispersers covered		Submerged Fill	Submerged Fill
<u>BAT Determination</u>		Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Submerged Fill	Submerged Fill
Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Submerged Fill	Submerged Fill
			Submerged Fill	Submerged Fill
		Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Submerged Fill	Submerged Fill
	Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered		Submerged Fill	Submerged Fill
		Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered	Submerged Fill	Submerged Fill
Solvent Usage Limitation as described in ST&C #2; use	Solvent Usage Limitation as described in ST&C #2; use of fabric filter; keep dispersers covered		Submerged Fill	Submerged Fill
			Submerged Fill	Submerged Fill
			Submerged Fill	Submerged Fill

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		3745-21-07	3745-21-09	3745-21-09
		3745-17-07		
		3745-17-11		
	3745-31-05	3745-15-07	3745-21-09	3745-21-09
Applicable	3745-21-07			
Federal	3745-17-07			
&	3745-17-11	3745-31-05	3745-21-09	3745-21-09
<u>OAC</u>	3745-15-07	3745-21-07		
<u>Rules</u>		3745-17-07		
		3745-17-11		3745-21-09
		3745-15-07	3745-21-09	
3745-31-05	3745-31-05			3745-21-09
3745-21-07	3745-21-07	3745-31-05	3745-21-09	
3745-17-07	3745-17-07	3745-21-07		
3745-17-07	3745-17-11	3745-17-07		3745-21-09
3745-17-11	3745-15-07	3745-17-11		
3745-15-07		3745-15-07	3745-21-09	3745-21-09
			3745-21-09	
	3745-31-05	3745-21-09		
	3745-21-07			
	3745-17-07			
	3745-17-11	3745-21-09	3745-21-09	
3745-31-05	3745-15-07			
3745-21-07		3745-21-09	3745-21-09	
3745-17-07	3745-31-05			
3745-17-11	3745-21-07			
3745-15-07	3745-17-07	3745-21-09	3745-21-09	
	3745-17-11			
	3745-15-07			
		3745-21-09	3745-21-09	
	3745-31-05			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	21.00 tons/yr			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	Solvent Usage: 2625 tons/yr	VOC: 2.4 lbs/hr		
	TSP: 0.1 lb/hr	VOC: 2.4 tons/yr	VOC: 0.38 ton/yr	VOC: 0.05 ton/yr
	TSP: 0.44 ton/yr	Solvent Usage: 300 tons/yr		
	Lead: 0.01 lb/hr	TSP: 0.1 lb/hr	VOC: 0.11 ton/yr	VOC: 0.22 ton/yr
	Lead: 0.044 ton/yr	TSP: 0.44 ton/yr		
	VOC: 24 lbs/hr	VOC: 3.4 lbs/hr		VOC: N/A
	VOC: 13.92 tons/yr	VOC: 3.36 tons/yr	VOC: 0.001 ton/yr	
	Solvent Usage: 1740 tons/yr	Solvent Usage: 420 tons/yr		VOC: 0.38 ton/yr
VOC: 30 lbs/hr	TSP: 0.1 lb/hr	TSP: 0.1 lb/hr	VOC: 0.11 ton/yr	
	TSP: 0.44 ton/yr	TSP: 0.44 ton/yr		VOC: 0.05 ton/yr
	Lead: 0.01 lb/hr	VOC: 1.52 lbs/hr		
VOC: 18.64 tons/yr	Lead: 0.006 ton/yr	VOC: 1.44 tons/yr	VOC: 0.001 ton/yr	
	VOC: 7.2 lbs/hr	Solvent Usage: 180 tons/yr		
Solvent Usage: 2330 tons/yr	VOC: 7.2 tons/yr	TSP: 0.1 lb/hr	VOC: 0.11 ton/yr	
	Solvent Usage: 900 tons/yr	TSP: 0.44 ton/yr		
TSP: 0.1 lb/hr	TSP: 0.44 ton/yr	VOC: 0.44 ton/yr	VOC: 0.05 ton/yr	
TSP: 0.44 ton/yr	VOC: 7.2 lbs/hr	VOC: 1.64 tons/yr	VOC: 0.05 ton/yr	
	VOC: 7.2 tons/yr			
Lead: 0.01 lb/hr	Solvent Usage: 900 tons/yr	VOC: 0.38 ton/yr	VOC: 0.05 ton/yr	
Lead: 0.044 ton/yr	TSP: 0.1 lb/hr			
	TSP: 0.44 ton/yr	VOC: 0.27 ton/yr	VOC: 0.05 ton/yr	
	VOC: 6.0 lbs/hr			
VOC: 33 lbs/hr	VOC: 6.24 tons/yr			
	Solvent Usage: 780 tons/yr	VOC: 0.11 ton/yr	VOC: N/A	
VOC:	TSP: 0.1 lb/hr			
	TSP: 0.44 ton/yr	VOC: 0.27 ton/yr	VOC: N/A	

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	86.14
TSP	0.78
Lead	0.018

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 Ohio Environmental Protection Agency Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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

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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.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Ohio Environmental Protection Agency Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

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

1. This Permit to Install is meant to modify the conditions specified in PTI #02-4672 (issued on April 4, 1990) and to cover the installation of one additional source (P007); the 50 HP Hockmeyer Paint Disperser (#7) that was installed subsequent to the original 8 covered by PTI #02-4672. Aexcel Corp. wishes to become synthetic minor through the use of solvent usage restrictions.
2. The monthly solvent usage from the sources covered by this Permit shall not exceed the tons of usage as listed in the following table:

Month	Disperser Number									Total
	#1	#2	#3	#4	#5	#6	#7	#8	#9	
Jan	55	70	45	75	75	65	25	35	15	460
Feb	75	90	90	75	75	65	25	35	15	545
Mar	315	315	145	75	75	65	25	35	15	1065
Apr	315	315	250	75	75	65	25	35	15	1170
May	315	345	250	75	75	65	25	35	15	1200

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Jun	315	345	250	75	75	65	25	35	15	1200
Jul	315	345	250	75	75	65	25	35	15	1200
Aug	250	315	175	75	75	65	25	35	15	1030
Sep	130	170	100	75	75	65	25	35	15	690
Oct	130	170	95	75	75	65	25	35	15	685
Nov	65	75	45	75	75	65	25	35	15	475
Dec	50	70	45	75	75	65	25	35	15	455
Sum	2330	2625	1740	900	900	780	300	420	180	10175

The solvent used in each disperser shall be determined by a metering system which will measure solvent input and output. The metering system shall be operated according to manufacturers specifications and shall be calibrated as least twice each year. Documentation of the calibrations shall be maintained at the facility for a period of at least five years.

- On a quarterly basis, Aexcel Corp. shall submit a report to the Ohio EPA, Northeast District Office summarizing the solvent usage for each disperser for each of the previous three months. It must state the disperser number (and Ohio EPA Source number), tons of solvent metered in, tons of product metered out, and the solvent requirement of each product, by weight. The monthly records, summarized quarterly, shall be reported on a quarterly basis to the Ohio EPA Northeast District Office. The reports shall be submitted by April 30, July 31, October 31, and January 31 of each year for the previous three calendar months. Any exceedance of the solvent use limitations listed in paragraph 2 shall be reported within 5 working days to the Ohio EPA Northeast District Office. The report shall include the cause of the exceedance as well as the steps Aexcel will take to prevent its recurrence.
- All solvents shall be fed into the dispersers through closed piping, and the hatches of all disperser lids shall be kept closed whenever operationally possible to minimize evaporative emissions of volatile organic compounds.
- Aexcel shall calculate the solvent loss factor on an annual basis. The solvent loss factor used for this Permit to Install is 0.8%. The recalculated value along with all documentation and calculations shall be submitted to Ohio EPA with the first quarterly report of each year. Should the recalculated solvent loss factor increase, Aexcel shall decrease production so that the monthly emissions remain no greater than the permitted monthly emission rates.