



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: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
LAKE COUNTY
Application No: 02-08023

DATE: 11/2/2000

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: 11/2/2000
Effective Date: 11/2/2000**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-08023

Application Number: **02-08023**
APS Premise Number: **0243081231**
Permit Fee: **\$100**
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 02-8023, 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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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.

<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>
P010	15 HP Hockmeyer Paint Dispenser; #10	Solvent usage limitation as described in STC #2; use of fabric filler; keep disperser covered	3745-31-05 3745-21-07 3745-17-07 3745-17-11 3745-15-07	VOC: 1.5 lbs/hr VOC: 1.44 tons/yr TSP: 0.1 lb/hr TSP: 0.44 ton/yr

SUMMARY TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	1.44
TSP	0.44

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.

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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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.

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 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.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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1. This Permit to Install is for the installation of a 15 HP Hockmeyer Pain Dispenser (#10). Aexcel wishes to limit the production of this source such that VOC emissions will not exceed 1.44 tons per year.

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2. The monthly solvent usage from this source shall not exceed the tons of usage as listed in the following table:

<u>Month</u>	<u>Solvent Usage (Tons)</u>
January	15
February	15
March	15
April	15
May	15
June	15
July	15
August	15
September	15
October	15
November	15
December	15
Total	180

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 at least twice each year. Documentation of the calibrations shall be maintained at the facility for a period of at least five years.

3. On a quarterly basis, Aexcel Corp. shall submit a report to the Ohio EPA, Northeast District Office summarizing the solvent usage for the 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, 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.
4. All solvent shall be fed into the disperser 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.

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5. 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.