



State of Ohio Environmental Protection Agency

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Columbus, OH 43215

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL**

**CLARK COUNTY**

**Application No: 08-04930**

**Fac ID: 0812100434**

**DATE: 5/6/2008**

Corrotec, Inc.  
David Stratton  
1125 W. North St.  
Springfield, OH 45504

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

*Michael W. Ahern*



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

CC: USEPA

RAPCA



Permit To Install  
Terms and Conditions

Issue Date: 5/6/2008  
Effective Date: 5/6/2008

**FINAL PERMIT TO INSTALL 08-04930**

Application Number: 08-04930  
Facility ID: 0812100434  
Permit Fee: **\$600**  
Name of Facility: Corrotec, Inc.  
Person to Contact: David Stratton  
Address: 1125 W. North St.  
Springfield, OH 45504

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1125 W. North St.**  
**Springfield, Ohio**

Description of proposed emissions unit(s):  
**Chapter 31 modification replacing PTI 08-01311 issued 3/9/88 to increase emissions for K001, and add new adhesive operations station emissions unit.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. Air Pollution Nuisance**

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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

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

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. 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.

**13. Source Operation and Operating Permit Requirements 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, 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 emissions unit(s) covered by this permit.

**14. 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.

**15. 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 this Permit to Install.

**B. 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>
organic compounds	10.4

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. 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.

**Operations, Property, and/or Equipment - (K001) - miscellaneous metal parts coating line, spray paint booth with filters (installed pre 08/03/2006)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions from this emissions unit shall not exceed <b>39.2 pounds per day from coatings</b> and 7.2 tons per year, including both coatings and cleanup materials.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(i), OAC rule 3745-17-11(C) and OAC rule 3745-17-07(A)(1).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	The coating material usage for this emissions unit shall be less than 8 gallons per day for the coating of miscellaneous metal parts.
OAC rule 3745-17-11(C)	The particulate emissions from this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. See section B.1 below.
OAC rule 3745-17-07(A)(1)	See section 2.a below.

**2. Additional Terms and Conditions**

- 2.a The visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

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

1. 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.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and company identification number of each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The OC content of each coating employed, in pounds per gallon, as applied.
  - d. The total number of gallons of all the coatings employed.
  - e. The total OC emissions from all coatings employed, in pounds [i.e., the summation of (b) x (c) for each coating employed].
3. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. The name and company identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The OC content of each cleanup material employed, in pounds per gallon.
  - d. The total OC emissions from all cleanup materials employed, in pounds [i.e., summation of (b) x (c) for each coating employed], in pounds per month.
  - e. The amount of cleanup material recovered, in pounds.
  - f. The total monthly OC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
4. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating materials for the calendar year in Section C.2 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.3].
5. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule

3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

#### D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:  
The coating material usage for this emissions unit shall be less than 8 gallons per day for the coating of miscellaneous metal parts.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.2.d.
  - b. Emissions Limitation:  
The OC emissions from this emissions unit shall not exceed **39.2 pounds per day from coatings**.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.2.e.

- c. Emissions Limitation:  
The OC emissions from this emissions unit shall not exceed 7.2 tons per year, including both coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.4.

- d. Emission Limitation:  
The visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- 2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

## F. Miscellaneous Requirements

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. 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.

**Operations, Property, and/or Equipment -(K003) - miscellaneous metal and plastic parts coating line, adhesive application area and roll coaters (installed pre 08/03/2006)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions from this emissions unit shall not exceed 48.0 pounds per day from coatings and adhesives.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(i).</p>
OAC rule 3745-21-09(U)(2)(e)(i)	<p>The coating material usage for this emissions unit shall be less than 8 gallons per day for the coating of miscellaneous metal parts.</p> <p>The combined coating and adhesive material usage for this emissions unit shall be less than 8 gallons per day. See section 2.a below.</p>
OAC rule 3745-31-05(C) (voluntary operating restriction to avoid air toxics modeling, state only enforceable)	The OC emissions from this emissions unit shall not exceed 3.16 tons per year, including coatings, adhesives and cleanup materials. See section B.1 below.

**2. Additional Terms and Conditions**

- 2.a** The permittee requested limiting the combined coating and adhesive usage to 8 gal/day for both materials combined, regardless of coating metal or plastic parts. By limiting the combined usage to the more restrictive usage limitation of OAC rule 3745-21-09(U)(2)(e)(i) required when coating metal parts, it was determined that separate recordkeeping for metal and plastic parts would not be necessary and all of the record keeping could be combined.

**B. Operational Restrictions**

1. This emissions unit shall not use more than 550 gallons per year of primer coating material and 550 gallons per year adhesive materials.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and company identification number of each coating and adhesive employed.
  - b. The number of gallons of each coating and adhesive employed.
  - c. The OC content of each coating and adhesive employed, in pounds per gallon, as applied.
  - d. The total number of gallons of all the coatings and adhesives employed.
  - e. The total OC emissions from all coatings and adhesives employed, in pounds [i.e., the summation of (b) x (c) for each coating and each adhesive employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. The name and company identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The OC content of each cleanup material employed, in pounds per gallon.
  - d. The total OC emissions from all cleanup materials employed, in pounds [i.e., summation of (b) x (c) for each coating employed], in pounds per month.
  - e. The amount of cleanup material recovered, in pounds.
  - f. The total monthly OC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
3. The permittee shall calculate and record the total annual OC emissions from coatings, adhesives, and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating and adhesive materials for the calendar year in Section C.1 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.2].

4. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

#### **D. Reporting Requirements**

1. The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total OC emissions, in tons, the total coating usage, in gallons, and the total cleanup material usage, in gallons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:  
The combined coating and adhesive material usage for this emissions unit shall be less than 8 gallons per day.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.1.d.
  - b. Emissions Limitation:  
The OC emissions from this emissions unit shall not exceed 48.0 pounds per day from coatings and adhesives.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.1.e.
  - c. Emissions Limitation:

The OC emissions from this emissions unit shall not exceed 3.16 tons per year, including coatings, adhesives and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

#### **F. Miscellaneous Requirements**

None