State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL** **CERTIFIED MAIL**
**WAYNE COUNTY**

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**Application No: 02-16372**

**DATE:** 5/30/2002

Robin Industries
Richard Jurjevic
300 West Clay St
Fredericksburg, OH 44627

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 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

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

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 5/30/2002** |
| **Terms and Conditions** | **Effective Date: 5/30/2002** |

**FINAL PERMIT TO INSTALL 02-16372**

| | |
|---|---|
| Application Number: | 02-16372 |
| APS Premise Number: | 0285000406 |
| Permit Fee: | **$200** |
| Name of Facility: | Robin Industries |
| Person to Contact: | Richard Jurjevic |
| Address: | 300 West Clay St<br>Fredericksburg, OH 44627 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**300 West Clay St**
**Fredericksburg**, **Ohio**

Description of proposed emissions unit(s):
**Coating machine 2.**

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

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 Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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 quarterly, i.e., 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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 thirty (30) 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**

| Pollutant | Tons Per Year |
|---|---|
| OC | 18.TPY non-photochemically reactive materials |
| OC | 7.3 TPY photochemically reactive materials |
| Total OC | 26.0 TPY |

Emissions Unit ID: **R002**

**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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R002 - Dip spinner used to apply adhesive coating. | OAC rule 3745-31-05(A)(3) | 4.27 pounds OC per hour.<br><br>102.5 pounds per day and 18.7 tons per year OC (see 2.a.). |
| | OAC rule 3745-21-07(G)(2) | Organic compound (OC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year (see 2.b.). |

**2. Additional Terms and Conditions**

**2.a** This emissions unit becomes subject to 3745-31-05(A)(3) on any day when any non-photochemically reactive material is employed (coating and cleanup). Specifically identified in the permit application: Chemlok y-1540 as a non-photochemically reactive material.

**2.b** This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed (coating and cleanup). Specifically identified in the permit application: Xylene/Permaflex as a photochemically reactive material.

**B. Operational Restrictions**

**1.** When using a non-photochemically reactive material in this emissions unit, the limits specified

about per OAC rule 3745-31-05(A)(3) shall apply (4.27 pounds per hour, 102.5 pounds per day and 18.7 tons per year).

**2.** When using a photochemically reactive material in this emissions unit, the limits of OAC rule 3745-21-07(G)(2) shall apply (8 pounds per hour, 40 pounds per day and 7.3 tons per year).

## C. Monitoring and/or Record keeping Requirements

**1.** The permittee shall collect and record the following information for each day for the coating operation:

(a) The company identification for each coating and cleanup material employed.

(b) The number of gallons of each coating and cleanup material employed.

(c) The organic compound content of each coating and cleanup material, in pounds per gallon.

(d) An identification of whether a coating is photochemically reactive.

(e) The total organic compound emission rate for all coatings and cleanup materials, in pounds per day on days when photochemically reactive materials are used.

(f) The total organic compound emission rate for all coatings and cleanup materials, in pounds per day on days when non-photochemically reactive materials are used.

(g) The total number of hours the emissions unit was in operation.

(h) The average hourly organic compound emission rate for all coatings and cleanup materials on days when photochemically reactive materials are used, i.e., (e)/(g), in pounds per hour (average).

(i) The average hourly organic compound emission rate for all coatings and cleanup materials on days when non-photochemically reactive materials are used, i.e., (f)/(g), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

**2.** The permit to install for this emissions unit (R002) was evaluated based on the actual materials

(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV ($mg/m^3$): 1880

Maximum Hourly Emission Rate (lbs/hr): 2.90

Predicted 1-Hour Maximum Ground-Level
Concentration ($ug/m^3$): 4584

Predicted 1-Hour Maximum Ground-Level
Concentration, sum for Methanol of R001 and R002, combined ($ug/m^3$): 10230

MAGLC ($ug/m^3$): 44762

Pollutant: Methanol

TLV ($mg/m^3$): 262

Maximum Hourly Emission Rate (lbs/hr): 1.19

Predicted 1-Hour Maximum Ground-Level
Concentration ($ug/m^3$): 1850

Predicted 1-Hour Maximum Ground-Level
Concentration, sum for Methanol of R001 and R002, combined ($ug/m^3$): 2161.7

MAGLC ($ug/m^3$): 6238

Pollutant: Xylene

TLV ($mg/m^3$): 434

Maximum Hourly Emission Rate (lbs/hr): 1.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m$^3$): 3729

MAGLC (ug/m$^3$): 10,300

**3.** Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**4.** If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

**5.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

**1.** The permittee shall notify the Director (the Ohio EPA Northeast District Office ) 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 (the Ohio EPA Northeast District Office ) within 30 days following the end of the calendar month.

**2.** The permittee shall submit deviation (excursion) reports which include the following information:

(a) For the days during which a non-photochemically reactive material was employed, an identification of each hour during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeds 4.27 pounds per hour, and the actual OC emissions for each such hour.

(b) For the days during which a non-photochemically reactive material was employed, an identification of each hour during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeds 102.5 pounds per day, and the actual OC emissions for each such hour.

(c) For the days during which a photochemically reactive material was employed, an identification of each hour during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeds 8 pounds per hour, and the actual OC emissions for each such hour.

(d) For the days during which a photochemically reactive material was employed, an identification of each hour during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeds 40 pounds per day, and the actual OC emissions for each such hour.

The notification shall include a copy of such record(s) and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

**3.** The permittee shall submit annual reports which specify the total OC emissions from this

emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

**E. Testing Requirements**

**1.** Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
4.27 pounds OC per hour for non-photochemically reactive materials.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C . I . In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the OC 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.

b. Emission Limitation :
102.5 pounds of OC per day based on an average for each calender month for non-photochemically reactive materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

c. Emission Limitation:
18.7 tons per year OC for non-photochemically reactive materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

d. Emission Limitation:
8 pounds OC per hour for photochemically reactive materials.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C . I . In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the OC 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.

e. Emission Limitation :
40 pounds of OC per day based on an average for each calender month for photochemically reactive materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

f. Emission Limitation:
7.3 tons per year OC for photochemically reactive materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

## F. Miscellaneous Requirements

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-16372 Facility ID: 0285000406

FACILITY NAME Robin Industries

FACILITY DESCRIPTION coating machine 2. CITY/TWP Fredericksburg

SIC CODE 3089 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Dip spinner applying an adhesive coating to plastic parts.

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| $PM_{10}$ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | (non-photochemically reactive) 4.27 lbs/hr, (photochemically reactive) 1.33 lbs/hr | (non-photochemically reactive) 8.54 TPY (photochemically reactive) 5.80 TPY | (non-photochemically reactive) 4.27 lbs/hr, 102.5 lbs/day (photochemically reactive) 8 lbs/hr and 40 lbs/day | (non-photochemically reactive) 18.7 TPY, (photochemically reactive) 7.3 TPY |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** Daily and annual OC emission limitations, use of non-photochemically and photochemically reactive materials. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Methanol, Ethanol, Xylene