



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22566

Fac ID: 0285010331

DATE: 10/9/2007

Bekaert Contours
Diana Morris
510 Collins Blvd.
Orrville, OH 44667

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/9/2007
Effective Date: 10/9/2007**

FINAL PERMIT TO INSTALL 02-22566

Application Number: 02-22566
Facility ID: 0285010331
Permit Fee: **\$400**
Name of Facility: Bekaert Contours
Person to Contact: Diana Morris
Address: 510 Collins Blvd.
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:
**510 Collins Blvd.
Orrville, Ohio**

Description of proposed emissions unit(s):
Conveyorized degreaser using Stoddard Solvent.

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

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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)

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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.

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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>
VOC	29.23

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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 - (P005) - cold solvent wire cleaning operation consisting of 5 stationary and 9 portable units

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	4872.1 lbs. per month and 29.23 tons per year of VOC emissions Also see B.1 below.
OAC rule 3745-21-07(G)	None. See A.2.a below.

2. Additional Terms and Conditions

- 2.a The emissions unit shall not employ photochemically reactive material as defined in OAC rule 3745-21-01(C)(3), therefore, no emission limitations from OAC rule 3745-21-07(G) apply.

B. Operational Restrictions

1. The cold solvent cleaning units shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Workplace fans shall not be placed near the cold solvent cleaning units opening, and exhaust ventilation shall not exceed 65 cubic feet per minute per square foot of cold solvent cleaning units opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - b. Openings to the cold solvent cleaning units shall be minimized during operation, so that entrances and exits silhouette workloads.
 - c. The cold solvent cleaning units shall be provided with downtime covers for closing off the entrance and exit during shutdown hours when solvent remains in the unit.

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- d. The top access lids of the cold solvent cleaning units shall remain closed to prevent solvent evaporation, except when line speed produce a danger of vapor flashing.
- e. Waste solvent and solvent saturated rags shall be stored in covered containers.
- f. Solvent leaks shall be repaired immediately, or the cleaner shall be shut down.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records of the solvent composition of the cold cleaning solvent employed. If the permittee changes the solvent employed, the permittee shall determine and record if the solvent is a photochemically reactive material, according to OAC rule 3745-21-01(C)(5).
- 2. The permittee shall inspect the cold cleaning units daily and maintain records of the following information:
 - a. the date and amount of time that any workplace fans was placed near the cold solvent cleaning units opening, and exhaust ventilation that exceeds 65 cubic feet per minute per square foot of cold solvent cleaning units opening, except if a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - b. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the cold solvent cleaning units was not in use, excluding during maintenance activities.
 - c. the date and amount of time that any top access lid of the cold solvent cleaning units was not closed to prevent solvent evaporation, except when line speed produces a danger of vapor flashing.
 - d. the date that any waste solvent and solvent saturated rags were not stored in covered containers.
 - e. the date of any solvent leak and the maintenance records documenting the corrective action and time frame to correct the leak.

These records shall include the corrective action taken to return the units into compliance. These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

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3. The permittee shall collect and record the following information for each month for the solvent cleaning operation:
 - a. the company identification for cleaning solvent employed;
 - b. the number of gallons of each cleaning solvent dispensed;
 - c. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the month;
 - d. the VOC content of each cleaning solvent, in pounds per gallon; and

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- e. the total organic compound emission rate for all cleaning solvent, in pounds per month.
4. The permittee shall maintain records of the following information, collected at the end of each year:
- a. the total cleaning solvent added to the cold solvent cleaning units or the amount purchased for use in the emissions unit during the year;
 - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
 - c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.
5. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Stoddard solvent CAS # 8052-41-3
TLV (mg/m³): 525 mg/m³
Maximum Hourly Emission Rate (lbs/hr): 6.67
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2900
MAGLC (ug/m³): 12,500
6. Prior to making any physical changes to or changes in the method of operation of the emissions unit), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model

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the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

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- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing the use of photochemically reactive material. 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 annual reports that identify:
 - a. the date and amount of time that any workplace fans was placed near the cold solvent cleaning units opening, and exhaust ventilation that exceeds 65 cubic feet per minute per square foot of cold solvent cleaning units opening, except if a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - b. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the cold solvent cleaning units was not in use, excluding during maintenance activities.
 - c. the date and amount of time that any top access lid of the cold solvent cleaning units was not closed to prevent solvent evaporation, except when line speed produces a danger of vapor flashing.
 - d. the date that any waste solvent and solvent saturated rags were not stored in covered containers.
 - e. the date of any solvent leak and the maintenance records documenting the corrective action and time frame to correct the leak.

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These records shall include the corrective action taken to return the units into compliance.

3. The permittee shall submit annual reports that:
 - a. identify any month during which the VOC emissions exceeded the allowable monthly VOC emission;
 - b. specify the total organic compound emissions from this emissions unit for the previous calendar year; and
 - c. document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

1. Emission Limitation: 4872.1 lbs per month and 29.23 tons per year of VOC emissions

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Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the records kept in Sections C.3 and C.4.

F. Miscellaneous Requirements

None

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Emissions Unit ID: **P005**

SIC CODE 3316 SCC CODE 4 01 002 21 EMISSIONS UNIT ID P005
 EMISSIONS UNIT DESCRIPTION cold solvent wire cleaning units

DATE INSTALLED 1/90

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	139.29 lbs/day	25.42 tpy	4872.1 lbs/month	29.23 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?
4872.1 lbs/month and 29.23 tons per year of VOC/OC emissions. based upon maximum operating hours and the emissions determined by the material balance study done on these solvent cleaning units.
Use of operational practices similar to the cold cleaning unit requirements in OAC rule 3745-21-09(O)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants 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: stoddard solvent