



State of Ohio Environmental Protection Agency

**RE: PERMIT TO INSTALL DIRECT FINAL
MADISON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 01-7852

DATE: April 21, 1999

Stanley Electric U.S. Company, Inc.
Raefield D Watkins
420 East High Street
London, OH 43140

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 Director's 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
DAPC, CDO



**Permit To Install
Terms and
Conditions**

**Issue Date: April 21, 1999
Effective Date: April 21, 1999**

DIRECT FINAL OF PERMIT TO INSTALL 01-7852

Application Number: 01-7852
APS Premise Number: 0149000089
Permit Fee: **\$200**
Name of Facility: Stanley Electric U.S. Company, Inc.
Person to Contact: Raefield D Watkins
Address: 420 East High Street
London, OH 43140

Location of proposed air contaminant source(s) [emissions unit(s)]:
**420 East High Street
London, OHIO**

Description of proposed emissions unit(s):
SPRAY PAINTING LINE WITH ONE PARTS WASH AREA, ONE SPRAY PAINT BOOTH, ONE UV OVEN, AND ONE INFRARED OVEN.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the

submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.14 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

Stanley Electric U.S. Company, Inc

PTI Application: **01-7852**

April 21, 1999

Facility ID: **0149000089**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the

permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Stanley Electric U.S. Company, Inc
PTI Application: **01-7852**
April 21, 1999

Facility ID: **0149000089**

- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

10. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

11. Title V Permit To Operate Application

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

Stanley Electric U.S. Company, Inc
PTI Application: 01-7852
April 21, 1999

Facility ID: 0149000089

B. State Only Enforceable 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 Recordkeeping 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 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.

Stanley Electric U.S. Company, Inc
PTI Application: **01-7852**
April 21, 1999

Facility ID: **0149000089**

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 are inadequate 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 prove to be inadequate 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).

Stanley Electric U.S. Company, Inc
PTI Application: 01-7852
April 21, 1999

Facility ID: 0149000089

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. 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.

14. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Stanley Electric U.S. Company, Inc

Facility ID: 0149000089

PTI Application: 01-7852

April 21, 1999

C. 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>
OC	12.8
PM	2.5
NO _x	1.4
SO ₂	0.0084
CO	1.18

Stanley Electric U.S. Company, Inc

PTI Application: **01-7852**

April 21, 1999

Facility ID: **0149000089**

Part II -Facility Specific Terms and Conditions

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV hardcoat line with one parts wash area, one spray paint booth, one electric infrared oven and one electric ultraviolet oven, equipped with a thermal incinerator	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency. This emissions requirement is less stringent than the organic compound limits established by best available technology (BAT). See A.I.2.b. below.
	OAC rule 3745-21-07 (G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.55 pound per hour.
	OAC rule 3745-17-07	Opacity shall not exceed 20% as a six minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a. OAC rule 3745-21-07 (G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds

per hour and 40 pounds per day.

- 2.b. The requirement for 85% overall control established in A.I.1. above is less stringent than the BAT requirement established in B.I.1. below.

II. Operational Restrictions

1. The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permanent total enclosure (PTE) associated with emissions unit R024 shall be continuously maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51) whenever R024 is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

Emissions Unit ID: R024

- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).

- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.
3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

V. Testing Requirements

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

1. Emissions Limitation

0.55 lb PM/hr

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

2. Emissions Limitation

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emissions Limitation

Minimum overall control efficiency of 85%, by weight

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring required pursuant to section A.III.1 and A.III.2 of these terms and conditions and the emissions testing required below. Overall control efficiency shall be calculated as the product of (capture efficiency)x(destruction/removal efficiency), which shall be demonstrated pursuant to sections A.V.5 and A.V.5.a.

4. Emissions Limitation

Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring required pursuant to section A.III.1 and A.III.2 of these terms and conditions and the emission testing required below.

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within ninety days of completion of the installation of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the

thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Stanley Electric U.S. Company, Inc

PTI Application: **01 7053**

April

Facility ID: **0149000089**

Emissions Unit ID: **R024**

6. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV hardcoat line with one parts wash area, one spray paint booth, one electric infrared oven and one electric ultraviolet oven	OAC rule 3745-31-05	<p>Organic compound emissions shall not exceed 2.89 pounds per hour and 12.66 tons per year. See B.I.2.a. below.</p> <p>Particulate matter emissions from the coating operation shall not exceed 2.4 tons per year.</p> <p>Emissions from natural gas usage in the thermal incinerator shall not exceed the following:</p> <p>0.32 lb of NO_x per hour; 1.4 tons NO_x per year;</p> <p>0.01 lb of SO₂ per hour; 0.04 ton SO₂ per year;</p> <p>0.27 lb CO per hour; 1.18 tons CO per year;</p> <p>0.02 lb PM per hour; 0.09 ton PM per year;</p> <p>0.04 lb OC per hour; and 0.18 ton OC per year.</p>

Stanle
PTI A₁
April 21, 1999

Emissions Unit ID: **R024**

2. **Additional Terms and Conditions**

- a. Best Available Technology (BAT) for this emissions unit is the use of a Permanent Total Enclosure and a thermal incinerator with a minimum control efficiency of ninety-five percent.

II. Operational Restrictions

1. The thermal incinerator controlling emissions from emissions unit R024 shall operate with a minimum control (destruction) efficiency of ninety-five percent.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The name and identification number of the wash booth solvent, as applied.
 - h. The VOC content of the wash booth solvent, as applied, in pounds per gallon.
 - i. The number of gallons of wash booth solvent employed.
 - j. The total uncontrolled VOC emissions from all coatings, cleanup materials, and wash booth solvents employed, in pounds or tons.
 - k. The calculated, controlled VOC emission rate for all coatings, cleanup materials, and wash booth solvents in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the

Stanle
PTI A₁
April 21, 1999

Emissions Unit ID: **R024**

control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

- l. The number of hours of operation.
- m. The average hourly controlled emissions rate (i.e., k/l).

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly controlled organic compound emissions from the coatings, cleanup materials, and wash booth solvents exceeded 2.89 pounds per hour, and the actual average hourly controlled organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1. Emissions Limitation

Allowable annual particulate matter emissions from this emissions unit shall not exceed 2.4 Tons PM per year.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) to determine the pounds particulate matter per hour emissions rate. A conversion factor of 4.38 times the hourly emissions rate shall be used to determine the tons per year.

2. Emissions Limitation:

Allowable hourly organic compound emissions from this emissions unit shall not exceed 2.89 lbs OC per hour.

Applicable Compliance Method:

Compliance with the hourly OC limit shall be determined through daily recordkeeping as specified in Section B.III.1.

Emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted. Therefore, the above emission calculation for OC emissions per hour, shall be multiplied by a factor of 5%, for 95% control, only until results from the required testing adjusts this factor.

3. Emissions Limitation:

Allowable annual organic compound emissions from this emissions unit shall not exceed 12.66 tons OC per year.

Applicable Compliance Method:

Compliance with this annual OC limit shall be determined through the summation of the daily emissions values calculated in B.III. above.

4. Emissions Limitation:

Allowable hourly and annual emissions from natural gas usage in the thermal incinerator shall not exceed the following:

0.32 lb of NO_x per hour;
1.4 tons NO_x per year;

0.01 lb of SO₂ per hour;
0.04 ton SO₂ per year;

0.27 lb CO per hour;
1.18 tons CO per year;

0.02 lb PM per hour;
0.09 ton PM per year;

0.04 lb OC per hour; and
0.18 ton OC per year.

Stanle
PTI A₁
April 21, 1999

Emissions Unit ID: **R024**

Applicable Compliance Method:

Compliance with these limits shall be determined through daily recordkeeping of the number of hours of operation for emissions unit R024 and its control device, the thermal incinerator. These limits represent the maximum hourly natural gas usage of the thermal incinerator.

These emission limitations were determined by multiplying the natural gas usage (MM ft3) by the AP-42, 5th Ed., emission factor of each pollutant (lbs/MM ft3).

Emissions of NO_x from natural gas use shall be calculated as follows:

Hourly NO_x emissions from incinerator = 100 lbs NO_x/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator)

Annual NO_x emissions from incinerator = 100 lbs NO_x/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton)

Emissions of SO₂ from natural gas use shall be calculated as follows:

Hourly SO₂ emissions from incinerator = 0.6 lbs SO₂/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator)

Annual SO₂ emissions from incinerator = 0.6 lbs SO₂/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton)

Emissions of CO from natural gas use shall be calculated as follows:

Hourly CO emissions from incinerator = 84 lbs CO/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator)

Annual CO emissions from incinerator = 84 lbs CO/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton)

Emissions of PM from natural gas use shall be calculated as follows:

Hourly PM emissions from incinerator = 7.6 lbs PM/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator)

Annual PM emissions from incinerator = 7.6 lbs PM/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton)

Emissions of OC from natural gas use shall be calculated as follows:

Hourly OC emissions from incinerator = 11 lbs OC/106 ft3 (emission factor) x 3200 ft3/hr (max. capacity of incinerator)

Stanley Electric U.S. Company, Inc

PTI Application: **01 7052**

April

Facility ID: **0149000089**

Emissions Unit ID: **R024**

Annual OC emissions from incinerator = 11 lbs OC/106 ft³ (emission factor) x 3200 ft³/hr
(max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton)

Since these limits represent the maximum hourly capacity of the equipment, no additional compliance determination is required beyond the daily recordkeeping of hours of operation.

5. Emissions Limitation:

Organic compound emissions must be reduced by at least ninety-five percent, and a 100% capture efficiency shall be achieved through the use of a permanent total enclosure.

Applicable Compliance Method:

Compliance shall be determined through the emissions testing specified in A.V. above.

U.S. EPA Methods 24 and 24A and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for (a) coatings and cleanup materials and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleanup material or ink, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Note: The Method 24 or 24A data may be supplied by the manufacturer of the coating, cleanup material, or ink.

VI. Miscellaneous Requirements

Toxics Policy Requirement

1. This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV: 983 mg/m³:

Maximum Hourly Emission Rate: 1.95 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 19.25 ug/m³:

MAGLC: 23,405 ug/m³

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be

Stanley Electric U.S. Company, Inc

PTI Application: **01 7052**

April

Facility ID: **0149000089**

Emissions Unit ID: **R024**

considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.