



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Scott J. Nally, Director

12/19/2012

Certified Mail

Rhonda Ling  
 Robin Development Center  
 PO BOX 330  
 5200 County Road 120  
 Berlin, OH 44610

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000164  
 Permit Number: P0110234  
 Permit Type: Administrative Modification  
 County: Holmes

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Robin Development Center**

Facility ID:	0238000164
Permit Number:	P0110234
Permit Type:	Administrative Modification
Issued:	12/19/2012
Effective:	12/19/2012
Expiration:	12/17/2017





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Robin Development Center

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**Final Permit-to-Install and Operate**  
Robin Development Center  
**Permit Number:** P0110234  
**Facility ID:** 0238000164  
**Effective Date:** 12/19/2012

## Authorization

Facility ID: 0238000164  
Application Number(s): A0044412  
Permit Number: P0110234  
Permit Description: Administrative modification of no. 2 dip coating adhesive to metal parts to include federally enforceable restriction(s) to limit HAP emissions to minor source levels.  
Permit Type: Administrative Modification  
Permit Fee: \$100.00  
Issue Date: 12/19/2012  
Effective Date: 12/19/2012  
Expiration Date: 12/17/2017  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Robin Development Center  
5200 CR 120  
Berlin Twp., OH 44610

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
Robin Development Center  
**Permit Number:** P0110234  
**Facility ID:** 0238000164  
**Effective Date:** 12/19/2012

## Authorization (continued)

Permit Number: P0110234

Permit Description: Administrative modification of no. 2 dip coating adhesive to metal parts to include federally enforceable restriction(s) to limit HAP emissions to minor source levels.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	dip tank
Superseded Permit Number:	02-0097
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Robin Development Center  
**Permit Number:** P0110234  
**Facility ID:** 0238000164  
**Effective Date:** 12/19/2012

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Robin Development Center  
**Permit Number:** P0110234  
**Facility ID:** 0238000164  
**Effective Date:** 12/19/2012

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2 through B.10
  
2. Federally Enforceable Permit to Install and Operate P0110234 for this air contaminant source takes into account the following voluntary restrictions, regarding the emissions units specified in B.3 and B.4, as proposed by the permittee for the purpose of avoiding the requirements under the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products under 40 CFR Part 63, Subpart M, the requirements of 40 CFR Part 63, Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(G) and 112(J) (e.g. the Maximum Achievable Control technology (MACT) determinations for affected sources subject to case-by-case determination of equivalent emission limitations), as well as avoiding Title V requirements under OAC rules 3745-77-02 through 3745-77-11:
  - a) The emissions of each individual hazard air pollutant (HAP) from the usage of all materials employed at the emissions units specified in B.3 and B.4 shall not exceed 9.90 tons/year, based on a rolling, 12-month summation of the monthly emissions.
  - b) The emissions of total combined HAPs from the usage of all materials at the emissions units specified in B.3 and B.4 shall not exceed 24.90 tons/year, based on a rolling, 12-month summation of the monthly emissions.
  - c) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of Each Single HAP (tons)	Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons)
1	0.82	2.08
1 - 2	1.65	4.15
1 - 3	2.48	6.22
1 - 4	3.30	8.30
1 - 5	4.12	10.38



1 - 6	4.95	12.45
1 - 7	5.78	14.52
Month(s)	Maximum Allowable Cumulative Emissions of Each Single HAP (tons)	Maximum Allowable Cumulative Emissions of Combined Total HAPs (tons)
1 - 8	6.60	16.60
1 - 9	7.42	18.68
1 - 10	8.25	20.75
1 - 11	9.08	22.82
1 - 12	9.90	24.90

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

3. Voluntary restrictions to limit potential facility-wide emissions of individual HAPs and total combined HAPs concern the following emissions units:
  - a) K002 - Adhesive dip tank no. 1 for coating of metal parts and an electric, forced hot air blow dryer; and
  - b) K003 - Adhesive dip tank no. 2 for coating of metal parts and an electric, forced hot air blow dryer.
  
4. The following emissions units located at this facility, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exempt air contaminant sources installed subsequent to the issuance of this permit are subject to the rolling, 12-month emissions limitation(s) on individual HAPs and total combined HAPs in B.2.a) and B.2.b), but do not have operational restrictions for materials usages:
  - a) dip spin units;
  - b) spray coating units;
  - c) rubber molding machines;
  - d) plastic molding machines; and
  - e) any new emissions unit(s) that emit(s) HAPs.

Operational Restrictions

5. The maximum annual usage of all materials for the emissions units specified in B.3 shall not exceed 5790 gallons, based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following



the issuance of this permit, the permittee shall not exceed the materials usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Materials Usage (gallons)
1	482
1 - 2	965
1 - 3	1448
1 - 4	1930
1 - 5	2412
1 - 6	2895
1 - 7	3378
1 - 8	3860
1 - 9	4342
1 - 10	4825
1 - 11	5308
1 - 12	5790

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual materials usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

Monitoring & Record Keeping Requirements

6. The permittee shall maintain monthly records of the following information for operations from the emissions units specified in B.3:
  - a) the name and identification number of each material employed;
  - b) the individual HAP content of each material employed, in pounds per gallon, as applied;
  - c) the total combined HAP content of each material employed, in pounds per gallon, as applied;
  - d) the number of gallons of each material employed;
  - e) the total number of gallons of all materials employed;



- f) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of materials usage, in gallons.
- g) the total emissions, in tons, of each individual HAP for each month of operations;
- h) the total emissions, in tons, of total combined HAPs for each month of operations;
- i) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the emissions, in tons, of each individual HAP; and
- j) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the emissions, in tons, of total combined HAPs.

7. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the following for operations from the emissions units specified in B.3:
- a) the cumulative materials usage, in gallons, for each calendar month;
  - b) the cumulative emissions, in tons, of each individual HAP for each month of operations; and
  - c) the cumulative emissions, in tons, of total combined HAPs for each month of operations.

Reporting Requirements

8. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

<u>Emissions Unit ID</u>	<u>Term &amp; Condition</u>
the emissions units specified in B.3	B.2.a)
the emissions units specified in B.3	B.2.b)
the emissions units specified in B.3	B.2.c)
the emissions units specified in B.3	B.5

- b) the probable cause of each deviation (excursion);



- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

### Testing Requirements

- 9. Compliance with the allowable emission limitations in B.2 of these terms and conditions shall be determined in accordance with the following methods:

- a) Emission Limitations:

The emissions of each individual HAP from the usage of all materials employed at the emissions units specified in B.3 and B.4 shall not exceed 9.90 tons/year, based on a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the usage of all materials at the emissions units specified in B.3 and B.4 shall not exceed 24.90 tons/year, based on a rolling, 12-month summation of the monthly emissions.

- Applicable Compliance Method:

Compliance may be based on the following:

For emissions units, specified in section 3., that are subject to the voluntary restrictions for HAP emissions in B.2.a) through B.2.c), the record keeping requirements in B.6.g) and B.6.h), and during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the record keeping requirements in B.6.i) and B.6.j).

For emissions units, specified in B.4, that are not subject to the voluntary restrictions for material usages, the HAP emissions may be estimated by using the methods provided in the application for (Permit-To-Install and Operate) PTIO P0110234 for K002 and for PTIO P0110080 for K003 or an alternative method as approved by the Ohio EPA.

- b) U.S. EPA Method 311 (Appendix A to 40 CFR Part 63) or formulation data shall be used to determine the HAP content of coatings and cleanup materials. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

### Miscellaneous Requirements

- 10. None.



**Final Permit-to-Install and Operate**  
Robin Development Center  
**Permit Number:** P0110234  
**Facility ID:** 0238000164  
**Effective Date:** 12/19/2012

## **C. Emissions Unit Terms and Conditions**



**1. K002, dip tank**

**Operations, Property and/or Equipment Description:**

Adhesive dip tank no. 1 for coating of metal parts and an electric, forced hot air blow dryer

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2), d)(3), d)(4), e)(2) and e)(3)b

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 65.8 lbs/day from the usage of coating (adhesive) materials.</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	<p>The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.</p> <p>See b)(2)a.</p>
c.	OAC rule 3745-31-05(D)(1)(b) - voluntary restriction to avoid MACT and Title V requirements	See B.2 through B.10.



- (2) Additional Terms and Conditions
  - a. The coatings (adhesives) usage restriction of no more than 10 gal/day shall be required as long as any coating employed at this emissions unit cannot comply with the limit of 3.5 lbs. VOC/gal of coating, excluding water and exempt solvents, as required by OAC rule 3745-21-09(U)(1)(d) for non-exempt emissions units. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each day for this emissions unit:
    - a. the name and identification number of each coating employed;
    - b. the VOC content of each coating employed, in pounds per gallon, as applied;
    - c. the number of gallons of each coating employed;
    - d. the total number of gallons of all the coatings employed; and
    - e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b times d)(1)c for each coating employed.
  - (2) The application for (Permit-To-Install and Operate) PTIO P0110234 for K002 and PTIO P0110080 for K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
    - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):



- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: methyl isobutyl ketone (CAS# 00108-10-1).

TLV (mg/m<sup>3</sup>): 81.93 (20 ppm).

Maximum Hourly Emission Rate (lbs./hr.): 1.684565 (0.21225051 gram/sec) from each of K002 and K003.

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 372.2 from each of K002 and K003, and 744.4 µg/m<sup>3</sup> from K002 and K003, combined.

MAGLC (µg/m<sup>3</sup>): 1950.7255

The permittee, has demonstrated that emissions of methyl isobutyl ketone, from emissions unit(s)K002 and K003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model 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 rule 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - 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 the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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.



e) Reporting Requirements

- (1) The permittee shall notify the Director (Northeast District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Northeast District Office within 45 days after the exceedance occurs. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit. The annual compliance reports shall include:
  - a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including the daily coating usage limitation, and whether the records of the coating material usage demonstrated that daily emissions, as calculated in d)(1), did not exceed the limit of 65.8 pounds of VOC emissions per day; and
  - b. an identification of any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the procedure in c)(3), including any additional toxic air contaminants or an increased concentration of toxic air contaminants from new coatings or cleanup materials and/or an increase in material usage. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)d.

b. Emission Limitation:

VOC emissions shall not exceed 65.8 lbs/day from the usage of coating (adhesive) materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)e.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

- (2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of coating materials, where formulation data is not based on the same method or if it is determined to be necessary by the Director or an equivalent, alternative method(s), as approved by Ohio EPA.

g) **Miscellaneous Requirements**

- (1) The metal dip coating operation and associated operations of this emissions unit are not subject to 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. No chemical strippers that contain methylene chloride in paint removal processes are employed at this emissions unit and this emissions unit does not include a spray-applied surface coating operation.
- (2) The metal dip coating operation and associated operations of this emissions unit are not subject to 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. This emissions unit does not include any dry abrasive blasting, machining, spray painting or welding operation.
- (3) This permit is an administrative modification of PTI 02-10097, issued on May 30, 1996, to include restrictions to limit the potential HAP emissions.