



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
MARION COUNTY
Application No: 03-07911

DATE: 10/26/2000

Semco Inc
Richard Collins
1025 Pole Lane Rd
Marion, OH 43302

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style.

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/26/2000
Effective Date: 10/26/2000**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-07911

Application Number: **03-07911**
APS Premise Number: **0351010070**
Permit Fee: **\$0**
Name of Facility: **Semco Inc**
Person to Contact: **Richard Collins**
Address: **1025 Pole Lane Rd
Marion, OH 43302**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1025 Pole Lane Rd
Marion, OHIO**

Description of modification:
Modification to PTI #03-07911 issued 07/27/1994, modified 05/12/1999, to add 40 CFR Part 61, Subpart C under applicable federal and OAC rules for P003, P004, and P005.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources units listed below comprise the Permit to Install for **Semco Inc** located in **MARION** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>Core Cleanout Table</u>	<u>BAT Determination</u>
R001	P002 Paint Spray Booth #1 (Sand Mold Coating)		Compliance with terms and conditions in this permit and use of non-photochemically reactive coating
R002	P003 Paint Spray Booth #2 (Sand Mold Coating)	Snag Grinder/ Cut-off Saw	Compliance with terms and conditions in this permit and use of non-photochemically reactive coating
R003	P004 Paint Spray Booth #3 (Sand Mold Coating)		Compliance with terms and conditions in this permit and use of non-photochemically reactive coating
R004	P004 Paint Spray Booth #4 (Sand Mold Coating)	Shake out unit/ Jacket Removal	Compliance with terms and conditions in this permit and use of non-photochemically reactive coating
P001	P005 Electric Induction Furnace		Compliance with terms and conditions in this permit and use of non-photochemically
	P005 Electric Induction Furnace		Compliance with terms and conditions in this permit and use of non-photochemically

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
reactive coating	permit		3745-31-05 3745-17-11 40 CFR Part 61, Subpart C	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Use of Baghouse and compliance with terms and conditions in this permit	Use of Baghouse and compliance with terms and conditions in this permit	3745-31-05 3745-21-07	Applicable Federal & OAC Rules	51.7 lbs VOC/day
Use of Baghouse and compliance with terms and conditions in this permit	Use of Baghouse and compliance with terms and conditions in this permit	3745-31-05 3745-21-07	3745-31-05 3745-17-11 40 CFR Part 61, Subpart C	51.7 lbs VOC/day
Use of Baghouse and compliance with terms and conditions in this permit	Use of Baghouse and compliance with terms and conditions in this permit	3745-31-05 3745-21-07	3745-31-05 3745-17-11 40 CFR Part 61, Subpart C	51.7 lbs VOC/day
		3745-31-05 3745-17-11		<1.0 lb PM/hr
Use of Baghouse and compliance with terms and conditions in this permit		3745-31-05 3745-17-11 40 CFR Part 61, Subpart C		<0.1 lb PM/hr Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.004 TPY) See Additional Special Terms and Conditions.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
<p><0.1 lb PM/hr Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.004 TPY) See Additional Special Terms and Conditions.</p>	<p>24 hour period (0.022 lb/day, 0.004 TPY) See Additional Special Terms and Conditions.</p> <p>0.72 lb PM/hr Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.004 TPY) See Additional Special Terms and Conditions.</p>			
<p>0.13 lb PM/hr Emissions shall not exceed 10 grams of beryllium over a</p>				

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	5.03
VOC	4.136

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control

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system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The company shall not employ more than 10 gallons/day and 400 gallons/year for each source (R001-R004). Coatings applied in these sources shall not exceed a VOC content of 5.17 pounds/gallon, unless approved by the Ohio EPA, Northwest District Office.
2. The company shall only use the coating material contained in the Permit to Install (PTI) application for Sources R001-R004 dated February 14, 1994. Any changes in the composition of these coatings, or use of additional coatings material not previously listed, requires prior notification to and approval from the Ohio EPA, Northwest District Office.
3. The company shall maintain daily records/calculations that list the following information for each coating material employed in Sources R001-R004:
 - a. company identification of the coating material;
 - b. the number of gallons employed;
 - c. the VOC content in pounds of VOC per gallon of coating on an "as applied" basis;
 - d. the amount of VOC emitted (lbs/day); and,
 - e. the total amount used per calendar year.

The company shall immediately notify the Northwest District Office, Division of Air Pollution Control, of any exceedance of the emission limitations/coating restrictions of this permit.

These daily records, as well as any supporting coating analysis computations, shall be retained in the

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company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

4. The company shall submit an annual report documenting all exceedances of the emission limitations/coatings restrictions of this permit to the Ohio EPA district office. For each exceedance, the company shall also provide the following additional information:

- a. the cause of the excursion; and,
- b. the action that has been taken and/or will be taken to correct the violation and prevent further occurrences.

The report shall be submitted by January 15 of each year and shall cover the previous 12 month period. If no exceedances occurred, a report stating that fact is still required.

5. All reports are to be submitted to the Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402.
6. Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility.
7. The pressure drop across the Torit baghouses shall be maintained within the range of 1 to 6 inches of water and the Flakt baghouse within the range of 1 to 8 inches of water while the emissions units are in operation.
8. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
9. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
10. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
11. Quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northwest District Office. If no deviations occurred during a calendar quarter, a quarterly report shall be submitted which states that no deviations occurred during that quarter. The reports shall be

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submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

12. The permittee shall conduct, or have conducted, emission testing for emissions units P002, P003, P004 and P005 in accordance with the following requirements:
 - a. the emission testing shall be conducted within 90 days of startup;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium as referenced in 40 CFR Part 60, Subpart C., Section 61.32;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; and,
 - d. the test(s) shall be conducted while the emission unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northwest District Office 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 Ohio EPA Northwest District Office 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 Ohio EPA Northwest District Office.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.