



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: DRAFT PERMIT TO INSTALL MODIFICATION  
SANDUSKY COUNTY  
Application No: 03-16194  
Fac ID: 0372030199**

**CERTIFIED MAIL**

**DATE:** 12/16/2004

Eaton Inoac Company  
Shawn Reinhart  
1410 Motor Dr  
Fremont, OH 43420

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO

Toledo Metropolitan Area Council of Governments

MI

**SANDUSKY COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-16194 FOR AN AIR CONTAMINANT SOURCE FOR  
Eaton Inoac Company**

On 12/16/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Eaton Inoac Company**, located at **1410 Motor Dr, Fremont**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16194:

**Modification to Paint Line No 3.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 03-16194**

Application Number: 03-16194  
Facility ID: 0372030199  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Eaton Inoac Company  
Person to Contact: Shawn Reinhart  
Address: 1410 Motor Dr  
Fremont, OH 43420

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1410 Motor Dr  
Fremont, Ohio**

Description of proposed emissions unit(s):

**Modification to Paint Line No 3.**

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

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Director

Issued: To be entered upon final issuance

**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 of federally enforceable 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

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- 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. 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 shall be submitted pursuant to 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 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**

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**

**Eaton Inoac Company**

**Facility ID: 0372030199**

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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

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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

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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 ORC section 3704.08.
  - 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.

**10. Permit To Operate Application**

**Eaton Inoac Company**

**Facility ID: 0372030199**

**PTI Application: 03-16194**

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- a. If the permittee is required to apply for a Title V permit 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. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. 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.

#### **12. 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.

**Eaton Inoac Company**

**Facility ID: 0372030199**

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**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**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

**4. 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.

**Issued: To be entered upon final issuance****5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally**

Eaton Inoac Company  
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**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.

**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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
OC	33.12
PE	0.75
NOx	5.90
CO	4.94

**Eaton Inoac Company**

**Facility ID: 0372030199**

**PTI Application: 03-16194**

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

1. This emissions unit is subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Surface Coating of Plastic Parts and Product . The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP and with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

**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>	
K006 - paint line #3 with water wash systems and RTO (administrative modification of PTI #03-10819 issued 8/17/00)	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-08 (B)
		OAC rule 3745-23-06 (B)
		40 CFR, Part 63, Subpart PPPP
	OAC rule 3745-21-07 (G)(1)	
	OAC rule 3745-21-07 (G)(2)	
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-17-10 (B)	
OAC rule 3745-17-11 (B)		
OAC rule 3745-18-06 (A)		

Applicable Emissions  
Limitations/Control  
Measures

See Section A of Part II - FACILITY  
SPECIFIC TERMS AND  
CONDITIONS

8.55 pounds organic  
compounds (OC)/hour;  
33.12 tons OC/year

0.19 pounds particulate  
emissions (PE)/hour; 0.75  
ton PE/year

Visible PE shall not exceed  
5% opacity, as a six-minute  
average

combustion emissions from  
the RTO and ovens,  
combined:

1.47 pounds nitrogen oxides  
(NOx)/hour; 5.90 tons  
NOx/year

1.23 pounds carbon  
monoxide (CO)/hour; 4.94  
tons CO/year

See A.I.2.b, A.I.2.c, and  
A.I.2.d

See A.I.2.e

See A.I.2.e

See A.I.2.f

0.020 lb PE/mmBtu

See A.I.2.g

See A.I.2.h

See A.I.2.i

See A.I.2.i

**2. Additional Terms and Conditions**

**2.a** Paint Line #3 includes the following operations:

- a. paint mixing operation;
- b. primer spray booth with water curtain;
- c. indirect-fired primer curing oven;
- d. color spray booth with water curtain;
- e. clearcoat spray booth with water curtain;
- f. indirect-fired clearcoat curing oven; and
- g. paint cleanup operation.

**2.b** Best available technology (BAT) for this emissions unit shall be (a) the use of a regenerative thermal oxidizer (RTO) which can achieve a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight and (b) the use of water wash systems to control PE from the spray booths.

**2.c** The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10 (B).

**2.d** All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM<sub>10</sub>).

**2.e** The control efficiency requirement based on this rule is less stringent than the control efficiency requirement established pursuant to OAC rule 3745-31-05 (A)(3).

**2.f** The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**2.g** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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- 2.h** The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06 (A).
- 2.i** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

**II. Operational Restrictions**

1. The permittee shall operate the water wash system(s) whenever the paint booth(s) associated with this emissions unit is/are in operation.
2. The annual number of hours of operation for this emissions unit shall not exceed 8,030.
3. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
  - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and

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- e. all OC emissions must be captured and contained for discharge through a control device.
4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
5. 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.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that document any time periods when the water wash system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO whenever this 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.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
  - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, 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.
3. The permittee shall 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 calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

**Eaton Inoac Company**  
**PTI A**  
**Issued**

**Facility ID: 0372030199**

Emissions Unit ID: K006

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.0007 inch of water, as a 3-hour average.

4. The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:
  - a. pounds OC/hour from coating and cleanup operations, combined\*; and

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- b. tons OC/year from coating and cleanup operations, combined\*.

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

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA district office) in writing of any daily record showing that the water wash system(s) associated with this emissions unit was/were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA district office) within 30 days after the event occurs.
2. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly summaries that include a log of the downtime of the RTO, which includes the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
  - c. All exceedances of the hourly OC emission limitation.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I of the terms and conditions of

**Eaton Inoac Company**  
**PTI A**  
**Issued**

**Facility ID: 0372030199**

Emissions Unit ID: K006

this permit shall be determined in accordance with the following methods:

- a. Emission Limitations:  
8.55 pounds OC/hour; 33.12 tons OC/year

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Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly and annual OC emission limitations in accordance with the record keeping requirements established in Section A.III.4.

b. Emission Limitations:

0.19 pound PE/hour; 0.75 ton PE/year

Applicable Compliance Method:

The permittee may demonstrate compliance with the actual, worst case hourly PE rate (E) using the following equation for the paint spraying operations:

$$E = \text{PE rate (pounds/hour)}$$

$$E = (\text{maximum coating solids usage rate, in pounds/hour}) (1 - TE) (1 - CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the PE limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual PE limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation and the annual restriction of the number of hours of operation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitations:

1.47 pounds NOx/hour; 5.90 tons NOx/year

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly NOx emission limitation by combining the hourly combustion emissions from the primer curing oven, the clearcoat curing oven, and the RTO, as follows:

primer oven: Multiply the maximum rated capacity of the oven (1.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98)

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of 100 pounds NOx/mm cu. ft. of natural gas, and then divide by 1020  
mmBtu/ mm cu. ft. of natural gas.

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clearcoat oven: Multiply the maximum rated capacity of the oven (4.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 pounds NO<sub>x</sub>/mm cu. ft. of natural gas, and then divide by 1020 mmBtu/ mm cu. ft. of natural gas.

RTO: Multiply the maximum rated capacity of the oven (10.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 pounds NO<sub>x</sub>/mm cu. ft. of natural gas, and then divide by 1020 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the NO<sub>x</sub> limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

The annual NO<sub>x</sub> emission limitation was established by multiplying the hourly limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation and the annual restriction of the number of hours of operation, compliance with the annual limitation shall also be demonstrated.

- d. Emission Limitations:  
1.23 pounds CO/hour; 4.94 tons CO/year

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly CO emission limitation by combining the hourly combustion emissions from the primer curing oven, the clearcoat curing oven, and the RTO, as follows:

primer oven: Multiply the maximum rated capacity of the oven (1.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 pounds CO/mm cu. ft. of natural gas, and then divide by 1020 mmBtu/ mm cu. ft. of natural gas.

clearcoat oven: Multiply the maximum rated capacity of the oven (6.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 pounds CO/mm cu. ft. of natural gas, and then divide by 1020 mmBtu/ mm cu. ft. of natural gas.

RTO: Multiply the maximum rated capacity of the oven (10.0 mmBtu/hour) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 pounds CO/mm cu. ft. of natural gas, and then divide by

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1020 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the CO limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

The annual CO emission limitation was established by multiplying the hourly limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation and the annual restriction of the number of hours of operation, compliance with the annual limitation shall also be demonstrated.

- e. Emission Limitation:  
0.020 pound PE/mmBtu of actual heat input from the curing ovens

Applicable Compliance Method:

The permittee may demonstrate compliance with the PE limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft./hour) by the emission factor, from AP-42, Table 1.4-2 (revised 7/98) of 1.9 pounds PE (filterable)/mm cu. ft., and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hour). If required, compliance with the limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

- f. Emission Limitation:  
Visible PE shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

- g. Emission Limitation:  
100% capture and 90% destruction efficiencies, by weight, for OCs

Applicable Compliance Method:

If required, the capture efficiency shall be determined using Methods 1 - 4 and 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

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alternative if such approval does not contravene any other applicable requirement.) If required, 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 the approved alternative test protocol. 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.

- h. Emission Limitation:  
8,030 hours of operation/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with this annual restriction in accordance with the record keeping requirements established in Section A.III.4.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials employed in this emissions unit.

## **VI. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-10819 which was issued on August 17, 2000 for emissions units P008, P018, P019, R009, R011, and R018.

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**B. State Only 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>
K006 - paint line 3 with water wash and RTO (administrative modification of PTI #03-10819 issued 8/17/00)		See B.III.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl benzene  
TLV (ug/m3): 434

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Maximum Hourly Emission Rate (lb/hr): 0.37  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.7  
MAGLC (ug/m3): 10,330.00

Pollutant: methyl ethyl ketone  
TLV (ug/m3): 590  
Maximum Hourly Emission Rate (lb/hr): 2.54  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.7  
MAGLC (ug/m3): 14,048.00

Pollutant: xylene  
TLV (ug/m3): 434  
Maximum Hourly Emission Rate (lb/hr): 0.06  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.7  
MAGLC (ug/m3): 10,330.00

Pollutant: toluene  
TLV (ug/m3): 188  
Maximum Hourly Emission Rate (lb/hr): 188  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.7  
MAGLC (ug/m3): 4,476.00

Pollutant: methanol  
TLV (ug/m3): 262  
Maximum Hourly Emission Rate (lb/hr): 0.01  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.7  
MAGLC (ug/m3): 6,238.00

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None