



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-16016

DATE: 5/20/2004

American Armature
Steve Bell
980 Morgan Avenue
Tiffin, OH 44883

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the 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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 5/20/2004
Effective Date: 5/20/2004**

FINAL PERMIT TO INSTALL 03-16016

Application Number: 03-16016
APS Premise Number: 0374020121
Permit Fee: **\$700**
Name of Facility: American Armature
Person to Contact: Steve Bell
Address: 980 Morgan Avenue
Tiffin, OH 44883

Location of proposed air contaminant source(s) [emissions unit(s)]:
**980 Morgan Avenue
Tiffin, Ohio**

Description of proposed emissions unit(s):
Varnish dip tank and burn off oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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 Issued: 5/20/2004

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.66
OC	0.91

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - varnish dip tank with drying oven	OAC rule 3745-31-05 (A)(3)	36.50 pounds organic compounds (OC)/day 0.91 ton OC/year See A.2.a.
	OAC rule 3745-21-09 (U)(2)(e)(iii)	VOC exemption, based on maximum daily coating (varnish) usage never exceeding 10 gallons in any one day (See A.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(2)(e)(iii).
- 2.b This emissions unit is exempt from the compliant coating requirements of OAC rule 3745-21-09 (U)(1) provided coating material (varnish) never exceeds 10 gallons in any one day. If coating material usage exceeds 10 gallons in any one day, the emissions unit will no longer qualify for the exemption in OAC rule 3745-21-09 (U)(2)(e)(iii) and the permittee will be required to comply with the requirements of OAC rule 3745-21-09 (U)(1). The requirements of OAC rule 3745-21-09 (U)(1) will become applicable to this emissions unit on the day coating usage exceeds 10 gallons and will continue to be applicable even on following days where coating material (varnish) usage is less than 10 gallons.

B. Operational Restrictions

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Emissions Unit ID: K001

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for the varnish usage in the paint booth:
 - a. The name and identification number of each varnish employed.
 - b. The volume, in gallons, of each varnish employed.
 - c. The total volume, in gallons, of all the varnishes employed.
2. In conjunction with the record keeping requirements specified in Section C.1., the permittee shall collect and record the following information each month for varnish usage in the dip tank:
 - a. The company identification for each varnish employed.
 - b. The number of gallons of each varnish employed.
 - c. The organic compound content of each varnish employed, in pounds per gallon.
 - d. The organic compound emission rate for each varnish employed, in pounds per month [(b x c) for each varnish employed].
 - e. The total organic compound emission rate for all varnishes employed, in pounds per month [sum of (d) for all varnishes].
 - f. The annual, year to date organic compound emission rate from all varnishes employed [sum of (e) for each calendar month to date from January to December].

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual varnish emission limitation of 0.91 ton OC/year. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the

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applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
36.50 pounds OC/day & 0.91 ton OC/year

Applicable Compliance Method:

The daily emission limitation is based on a maximum varnish usage rate of 10 gallons per day and a maximum OC content of 3.65 pounds per gallon. Therefore provided compliance is shown with the daily varnish usage rate, compliance with the daily emission limitation will be assumed.

The annual emission limitation was developed by multiplying an OC content of 3.65 pounds/gallon of varnish by a maximum annual gallon usage of 500 gallons, and then dividing by 2000 lbs/ton. The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Section C.2.

- b. Emission Limitation:
maximum coating (varnish) usage never exceeding 10 gallons in any one day

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Section C.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
N001 - 150 pound/hour, natural gas-fired, varnish burn-off oven.	OAC rule 3745-31-05 (A)(3)	0.66 ton particulate emissions (PE)/year Opacity Restrictions (See A.2.a.) See A.2.b and A.2.e.
	OAC rule 3745-17-07 (A)	See A.2.c.
	OAC rule 3745-17-09 (B)	0.10 pound PE/100 pounds of material charged
	OAC rule 3745-23-06 (B)	See A.2.d.
	OAC rule 3745-21-08 (B)	See A.2.d.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09 (B).
- 2.c 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.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

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.

- 2.e** The Best Available Technology (BAT) Requirement for this emissions unit has been determined to be the use of natural gas. BAT requirements also include compliance with the terms and conditions of this permit.

B. Operational Restrictions

1. The permittee shall comply with the following operational restrictions:
 - a. the permittee shall ensure that the furnace is operated only by properly trained;
 - b. prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle; and
 - c. the permittee shall not process organic coatings or plastics which contain halogens (such as chlorine, fluorine, sulfur, or bromine), plastics, polymers, or other organic materials which emit significant amounts of volatile, flammable vapors at room temperature or at temperatures up to about 500 degrees Fahrenheit, parts which may contain large amounts of volatile solvents, and nonconventional hydrocarbon coatings (polymer coatings, paint/powder coatings, oil/grease coatings). Wet paint, paint sludge, waste powder from powder coating operations, paint filters, nitrocellulose paints, solvents, thinners, waste plastic or polymer, PVC (polyvinyl chloride), lead, rubber-coated material, wood, paper, trash, waste oil, waste grease, oil filters ammunition, explosives, fertilizer, or any hazardous waste materials defined in 40 CFR, Part 261, Subpart D are also prohibited from being burned in this furnace. In addition, coatings that contain chlorine (PVC), fluorine (Teflon), sulfur, bromine, or elements other than carbon, hydrogen, and oxygen shall not be burned in this furnace, as they may form dangerous, toxic, and corrosive acids.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain an operation/maintenance log for the burn-off oven. The log, at a minimum, shall contain the following information:
 - a. the dates the emissions unit was operated
 - b. the number of batches processed for each date the emissions unit was operated; and
 - c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation
0.66 ton PE/year

Applicable Compliance Method

The annual emission limit was developed by multiplying the emission limitation of 0.10 lb PE/100 lbs of material charged, a maximum charging capacity of 150 lbs/hr, a maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the emission limitation of 0.10 lb PE/100 lbs of material charged, compliance will also be shown with the annual limitation.

- b. Emission Limitation
Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

Applicable Compliance Method

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

0.10 pound PE/100 pounds of material charged

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with OAC rule 3745-17-03 (B)(8).

F. Miscellaneous Requirements

None