



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-17342**

**Fac ID: 0387040428**

**DATE: 2/12/2008**

Dillin Engineered Systems Corp.  
Martin Shaffer  
8030 Broadstone Road  
Perrysburg, OH 43351

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 2/12/2008  
Effective Date: 2/12/2008**

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**FINAL PERMIT TO INSTALL 03-17342**

Application Number: 03-17342  
Facility ID: 0387040428  
Permit Fee: **\$400**  
Name of Facility: Dillin Engineered Systems Corp.  
Person to Contact: Martin Shaffer  
Address: 8030 Broadstone Road  
Perrysburg, OH 43351

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**8030 Broadstone Road  
Perrysburg, Ohio**

Description of proposed emissions unit(s):  
**Paint booth**

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

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Chris Korleski  
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 (i.e., postmarked) quarterly 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

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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)**

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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.

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**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.

**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>
VOC	11.65

**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.

**Operations, Property, and/or Equipment -(K001) - Spray paint booth with dry filtration (Model PFF-16-10-T-LH)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<u>Coating usage:</u> 54 pounds of volatile organic compounds (VOC) per day 9.86 tons VOC per year  <u>Cleanup usage:</u> 298.33 pounds of VOC per month 1.79 tons VOC per year  See A.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage for enamel and primer coating operations never exceeding 10 gallons of coating in any one day.  See A.2.b.
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(C)	See B.1. and C.6.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule include compliance with 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 enamel and primer coating material usage 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

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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 usage is less than 10 gallons.

- 2.c** This emissions unit is exempt from the visible emissions (PE) limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to any mass emission limitation in OAC rule 3745-17-11.

**B. Operational Restrictions**

1. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.

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

1. The permittee shall collect and record the following information each day for coating material usage in emissions unit K001:
  - a. The company identification for each coating material employed;
  - b. The number of gallons of each coating material employed;
  - c. The total number of gallons of all coating material employed (sum of b).
2. In conjunction with the daily records required in section C.1 above, the permittee shall collect and record the following information each month for coating material usage in emission unit K001:
  - a. The company identification for each coating material employed;
  - b. The number of gallons of each coating material employed;
  - c. The organic compound content, in pounds per gallon, for each coating as applied;
  - d. The organic compound emission rate for each coating employed, in lbs/month (b x c);

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- e. The total organic compound emission rate for all coating materials employed [sum of (d)]; and
  - f. The annual, year to date, organic compound emissions from all coatings employed [sum of (e) for each calendar month to date from January to December].
3. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit K001:
  - a. The company identification of each cleanup material employed;
  - b. The number of gallons of each cleanup material employed;
  - c. The organic compound content, in pounds per gallon, for each cleanup material employed;
  - d. The organic compound emission rate for each cleanup material employed, in lbs/month (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density);

  - e. The total organic compound emission rate for all cleanup materials employed [sum of (d)]; and
  - f. The annual, year to date organic compound emissions from all cleanup materials employed (sum of (e) for each calendar month to date from January to December).
4. The permit to install for this emission unit was evaluated based on the actual materials 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

Emissions Unit ID: **K001**

by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434.192

Maximum Hourly Emission Rate (lbs/hr): 1.348

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 402.5MAGLC (µg/m<sup>3</sup>): 10,337.9

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.405

Maximum Hourly Emission Rate (lbs/hr): 0.1608

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 48.02MAGLC (µg/m<sup>3</sup>): 4485.8

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions 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
- 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.).

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5. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.
6. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
    - a. The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.
    - b. The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.
    - c. The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic

Emissions Unit ID: **K001**

inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection

frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
- g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.

#### **D. Reporting Requirements**

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the following limitations:
  - a. 9.86 tons VOC per year from coating operations;
  - b. 1.79 tons VOC per year from cleanup operations; and
  - c. 298.33 pounds VOC per month of cleanup operations.

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If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the paint booth employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

**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 methods:

- a. Emission Limitation  
54 pounds VOC per day from the coating operations

Applicable Compliance Method

Compliance with the daily emissions limitation shall be demonstrated through the monitoring and recordkeeping requirements established in condition C.1. of this permit.

- b. Emission Limitation  
9.86 tons of VOC/year from the coating operations

Applicable Compliance Method

The annual emission limitation was established by multiplying the daily coating limit by 365 days per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monitoring and recordkeeping requirements established in condition C.2. of this permit, compliance with the annual limitation shall be assumed.

- c. Emission Limitation  
298.33 of VOC/month from the cleanup operations

Applicable Compliance Method

Compliance with the monthly emissions limitation shall be demonstrated through the monitoring and recordkeeping requirements established in condition C.3. of this permit.

Emissions Unit ID: K001

- d. Emission Limitation  
1.79 tons of VOC/year from the cleanup operations

Applicable Compliance Method

The annual emission limitation was established by multiplying the annual cleanup usage rate of 500 gallons with the maximum VOC content of cleanup material (7.17 pounds per gallon) and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monitoring and recordkeeping requirements established in condition C.3. of this permit, compliance with the annual limitation shall be assumed.

- e. Emission Limitation  
Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method

Compliance with the coating usage restriction shall be based upon the recordkeeping requirements established in condition C.1. of this permit.

**F. Miscellaneous Requirements**

None