



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CLINTON 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: 05-11558

DATE: 1/17/2002

Kautex Textron
Dennis Vezina
474 S. Nelson St
Wilmington, OH 45177-2037

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/17/2002
Effective Date: 1/17/2002**

FINAL PERMIT TO INSTALL 05-11558

Application Number: 05-11558
APS Premise Number: 0514010084
Permit Fee: **\$200**
Name of Facility: Kautex Textron
Person to Contact: Dennis Vezina
Address: 474 S. Nelson St
Wilmington, OH 45177-2037

Location of proposed air contaminant source(s) [emissions unit(s)]:
**474 S. Nelson Ave
Wilmington, Ohio**

Description of proposed emissions unit(s):
Magni Coating Line - miscellaneous metal parts coating with thermal oxidizer.

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 Related to Monitoring and Recordkeeping 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

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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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
VOC	60.0

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Magni Coating Line - metal parts dip tank with thermal oxidizer (Terms in this permit supersede those of PTI 05-7367 previously issued on 01/04/96)	OAC rule 3745-31-05(A)(3)	5.7 pounds volatile organic compounds (VOC) per hour See Section A.2.b The emission limitations of this rule also include compliance with the limitations established pursuant to OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	60.0 tons VOC as a rolling, 12-month summation See Section A.2.c

2. Additional Terms and Conditions

- 2.a The hourly emissions limitation for VOC emissions was established to reflect potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The volatile organic compound emissions from the coating booth and drying oven shall be

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equipped with permanent total enclosure to ensure 100% capture. The volatile organic compound emissions from the coating booth and drying oven shall be vented to a thermal incinerator operating at a minimum destruction efficiency of 95%.

- 2.c** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the entire facility shall not exceed 10.0 TPY for any individual HAP and 25.0 TPY for any combination of HAPs as a rolling, 12-month summation.

B. Operational Restrictions

1. 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 less than 1400 degrees Fahrenheit.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance (but not less than 0.007 inches of water), whenever the emissions unit is in operation.
3. The maximum annual coating usage for this emissions unit shall not exceed 184,000 gallons, as applied, based upon a rolling, 12-month summation of the coating usage figures.

Given that the facility has been maintaining monthly records of coating usage for this emissions unit, compliance shall begin immediately following final issuance of this PTI. Therefore, no monthly restrictions for the first 12-months of operation, following the issuance of this permit, are required.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the 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:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring

equipment, when the associated emissions unit was in operation.

2. The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the volume in gallons of each coating, as applied;
 - c. the rolling, 12-month summation of the total volume, in gallons, of all coatings employed;
 - d. the VOC content of each coating, as applied;
 - e. the VOC emissions from all coatings, as applied [i.e., calculate VOC emissions from the mixing process (assume 1.5% loss), calculate VOC emissions from the coating process (95% control efficiency), and sum the results]; and
 - f. the rolling, 12-month summation of VOC emissions from all coatings employed.
3. The permittee shall maintain a rolling, 12-month summation of the emissions for each individual Hazardous Air Pollutant (HAP)* for the entire facility and the combined HAPs emissions for the entire facility.

[Note: A listing of Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.]

4. The permittee shall install, 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding areas.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
5. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup 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 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: Formaldehyde

TLV (mg/m³): 0.37

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 3.84

MAGLC (ug/m3): 8.8

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 still 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 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
 - 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.).
6. 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 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.

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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions A.2.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for this emissions unit:
 - a. the rolling, 12-month coating usage limitation (184,000 gallons); and
 - b. the rolling, 12-month VOC emissions limitation (60.0 tons);

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.2.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month individual HAP and/or combined HAPs emissions limitations for the entire facility: These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.2.
4. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.2.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -

5.7 lbs VOC per hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly coating usage (21 gallons) by the maximum VOC content (5.42 lbs/gal, as applied). The result, 113.8 lbs/hr, is then multiplied by the minimum destruction efficiency of the thermal incinerator of 95% (1 - 0.95). Compliance shall also be determined by emissions testing as specified in Section E.4.

- b. Emission Limitation -
60 tons VOC as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section C.2.

- c. Emission Limitation -
10.0 tons for any individual HAP and 25.0 tons for any combination of HAPs as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section C.3.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 1 year of the issuance of this permit to install.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate for volatile organic compounds (5.7 lbs/hr) and the overall control efficiency limitation for the thermal incinerator (95%).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): US EPA Reference Method 25 of 40 CFR Part 60, Appendix A or Method 25A - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum

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capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. This PTI modifies the previous PTI 05-7367 for emissions unit K002, which was issued on 01/06/96. The purpose of this modification is to accommodate a process change from a 2-dip system to a 1-dip system. In addition, this PTI contains rolling, 12-month emission limitations for VOC, individual HAP and combined HAPs, and a rolling 12-month coating usage limitation. The rolling, 12-month emission limitations will ensure "Synthetic Minor" status for this facility.