State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
SHELBY COUNTY

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: 05-14437
Fac ID: 0575010226
DATE: 5/1/2008

SIDCO (Sidney Tool and Die, Inc.)
Chuck Helmer
PO Box 849
Sidney, OH 45365-0849

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

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

CC: **USEPA** **SWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 5/1/2008**
Terms and Conditions	**Effective Date: 5/1/2008**

FINAL PERMIT TO INSTALL 05-14437

Application Number:	05-14437
Facility ID:	0575010226
Permit Fee:	**$200**
Name of Facility:	SIDCO (Sidney Tool and Die, Inc.)
Person to Contact:	Chuck Helmer
Address:	PO Box 849 Sidney, OH 45365-0849

Location of proposed air contaminant source(s) [emissions unit(s)]:
1985 Campbell Rd.
Sidney, Ohio, **Ohio**

Description of proposed emissions unit(s):
Trichloroethylene Open Top Vapor Degreaser.

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

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

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.

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

Pollutant	Tons Per Year
OC	2.75
HAP (trichloroethylene)	2.75

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 - (L002) - Trichloroethylene Open Top Vapor Degreaser

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (to avoid requirements of OAC rule 3745-31-05(A)(3)(a) (BAT) and Title V)	The Hazardous Air Pollutant (HAP) and organic compound (OC) emissions from this emissions unit shall not exceed 2.75 tons per rolling 12 month period.
OAC rule 3745-21-09(O)(6)(b)	See Section A.2.a below.
40 CFR Part 63 Subpart T	See Section B.1., B.2., C.1., and D.1.
OAC rule 3745-31-05(A)(3)(b)	See Section A.2.b.
OAC rule 3745-114-01	Ohio Toxic Policy

2. Additional Terms and Conditions

2.a After June 15, 1999, paragraphs (O)(2) to (O)(5) of OAC rule 3745-21-09(O) shall not apply to any solvent metal cleaning operation which is subject to Subpart T of 40 CFR Part 63, provided the requirements of Subpart T are specified in the terms and conditions of a permit to operate issued pursuant to OAC rule 3745-35-02, a permit to install issued pursuant to OAC rule 3745-31-05, or a Title V permit issued pursuant to OAC rule 3745-77-08.

2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this emissions unit since the potential emissions are less than ten tons per year.

B. Operational Restrictions

1. The open top vapor degreaser shall be equipped with and shall employ a cover and safety switches as described below:

    a. a primary condenser; and

    b. a working-mode cover.

2. The open top vapor degreaser shall be operated in accordance with the following:

    a. device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;

    b. a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser;

    c. parts shall be oriented so that the solvent drains from them freely;

    d. during startup of this emissions unit, the primary condenser shall be turned on before the sump heater;

    e. during the shutdown of this emissions unit, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;

    f. Any spraying operations shall be conducted in a manner that there is no direct expose of the solvent material to the ambient air;

    g. waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers;

    h. the closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent tp drain from the container;

    i. Sponges, fabric, wood, and paper products shall not be cleaned;

    j. The owner or operator of this emissions unit shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point; and

    k. the working-mode cover shall be maintained free of cracks, holes, and other

defects and shall open only for part entrance and removal and completely cover the cleaning machine openings when closed.

3. The rolling 12 month solvent lost from this emissions unit shall not exceed 450 gallons.

4. The HAP and/or OC content of the solvent material employed in this emissions unit shall not exceed 12.2 pounds per gallon.

C. Monitoring and/or Recordkeeping Requirements

1. The owner or operator of this emissions unit shall conduct visual inspection, at least once per month, and maintain a record of the results. The records shall document the following information:

   a. the device shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;

   b. the vapor level control device shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser;

   c. parts are oriented so that the solvent drains from them freely;

   d. at startup, the primary condenser is turned on before the sump heater;

   e. at shutdown, the sump heater is off and the solvent vapor layer is allowed to collapse before the primary condenser is turned off;

   f. any spraying operations is conducted in a manner that there is no direct expose of the solvent material to the ambient air;

   g. the waste solvent, still bottoms, and sump bottoms is collected and stored in closed containers;

   h. the closed containers does not allow liquid solvent to drain from the container;

   i. sponges, fabric, wood, and paper products are not being cleaned;

   j. the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point; and

   k. the working-mode cover is maintained free of cracks, holes, and other defects and shall open only for part entrance and removal and completely cover the cleaning machine openings when closed.

   These records shall be maintained for a period of at least 5 years and shall be made available to the director or his representative upon request.

2. The owner or operator of this emissions unit shall maintain the following monthly

records:

a. the amount of solvent material lost from this emissions unit, in gallons;

b. the HAP and/or OC content of the solvent material employed in this emissions unit, in pounds per gallon;

c. the HAP and/or OC emissions, in tons per month, (the summation of: [("a" x "b")/2000]); and

d. the rolling, 12-month HAP and/or OC emissions from this emissions unit, in tons (the total individual HAP and/or OC emissions, in tons, for the current month ("c") plus the total amount of HAP and/or OC emissions for the 11 previous calendar months).

3. The permit to install for this emissions 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 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

   Pollutant: Trichloroethylene (TCE)
   TLV (ppm): 10
   Maximum Hourly Emission Rate (lbs/hr): 0.45
   Predicted In-Stack Concentration: 0.20 ppm
   MAGLC (ppm): 0.24
   Highest Ground Level Concentration (ppm): 0.20 at 20 meters from stack based on SCREEN3 analysis.

4. 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.).

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.

5. 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 reports documenting any period of time in which this emissions unit was not operated and/or maintained in accordance with the requirements of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the amount of solvents lost exceeds 450 gallons per rolling 12-month period;

b. the HAP and/or OC content of the solvent employed exceeds 12.2 pounds per gallon; and

c. the rolling 12 month HAP and/or OC emissions from this emissions unit exceeds 2.75 tons.

E. Testing Requirements

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

   a. Emissions Limitation:

   2.75 tons of HAP and/or OC per rolling 12-month period.

   The rolling 12-month allowable HAP and/or OC emission limitation was based on the following equation:

   AER = (Sl x Sc)/ 2000lbs/ton

   where:

   AER = Allowable Emissions Rate, in tons per rolling 12-month period;
   Sl = Solvent lost, in gallons, (permittee requested a 450 gallon limitation); and
   Sc = Solvent content, pounds of HAP and/or OC in gallons of solvent.

   Applicable Compliance Method:

   Compliance with the HAP and/or OC rolling 12-month emission limitation shall be determined through the record keeping requirements established in Section C.2. of this permit.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., D. and E.