



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
MONTGOMERY 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: 08-04521**

**DATE: 8/7/2003**

Lau Industries-Englewood Plant  
Ed Donovan  
One Lau Parkway  
Englewood, OH 45315-8754

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

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 8/7/2003  
Effective Date: 8/7/2003**

**FINAL PERMIT TO INSTALL 08-04521**

Application Number: 08-04521  
APS Premise Number: 0857053116  
Permit Fee: **\$400**  
Name of Facility: Lau Industries-Englewood Plant  
Person to Contact: Ed Donovan  
Address: One Lau Parkway  
Englewood, OH 45315-8754

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

**1 Lau Pkwy  
Englewood, Ohio**

Description of proposed emissions unit(s):

**modification of P001 and K002 increasing emissions, chapter 31 replacing 08-3674 issued 8-13-97.**

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

**Lau Industries-Englewood Plant**  
**PTI Application: 08-04521**  
**Issued: 8/7/2003**

**Facility ID: 0857053116**

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.

**Lau Industries-Englewood Plant**  
**PTI Application: 08-04521**  
**Issued: 8/7/2003**

**Facility ID: 0857053116**

**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>
particulate	4.25
VOC	4.97

**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>
K002 - Electrodeposition coating of miscellaneous metal parts	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.5 lbs/hr and 4.97 tons/yr.
* Modification	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the materials used in this emissions unit shall not exceed 2.5 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

none

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

- 1. The permittee shall collect and record the following information each day for this emissions unit:

8

**Lau Ir**

**PTI A**

**Issued: 8/7/2003**

Emissions Unit ID: **K002**

- a. The name and identification number for each paste, resin and additive, as applied.
  - b. The number of gallons (excluding water and exempt solvents) of each paste, resin and additive, as applied.
  - c. The VOC content (excluding water and exempt solvents), in pounds per gallon of each paste, resin and additive, as applied.
  - d. The daily volume-weighted average VOC content, in pounds per gallon, of all the paste, resin and additive, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
2. The permittee shall on a monthly basis collect and record the total VOC emissions from all paste, resin and additive, as applied, in tons, for the purpose of determining the annual VOC emissions, i.e., the summation of  $(C.1.b) \times (C.1.c.) / (2000 \text{ lbs/ton})$  for all of the paste, resin and additive.

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

1. 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 daily volume-weighted average VOC content exceeds 2.5 pounds VOC per gallon of coating, excluding water and exempt solvents. 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.
2. The permittee shall also submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total VOC emissions from this emissions unit for the previous calendar year. This report shall be submitted by January 31 of each year.

#### **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-  
2.5 lb VOC/gallon, as a daily volume-weighted average, excluding water and exempt solvents.  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.

**Lau Industries-Englewood Plant**

**PTI Application: 08-04531**

**Issued**

**Facility ID: 0857053116**

**Emissions Unit ID: K002**

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, an owner or operator determines that Method 24

or 24(A) cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emission Limitation-  
2.5 lbs VOC/hr

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly paste, resin and additive usages times the maximum VOC content of 2.5 lbs/gallon.

- c. Emission Limitation-  
4.97 tons VOC/yr

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions in PTI 08-04521 for emissions unit K002 will supercede those identified in PTI 08-3674 issued on August 13, 1997. This modification represents an increase in the VOC emissions of 2.45 TPY.

**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>
P001 - 2 plasma cutters w/ torit dust collector  *Modification	OAC rule 3745-31-05(A)(3)          OAC rule 3745-17-11 and OAC rule 3745-17-07(A)	The particulate emissions (PE) from this emissions unit shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) and 4.25 tons per year (TPY).       The visible PE shall not exceed 5% visible emission opacity, as a 3-minute average.   The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

2.a none

**B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 5.0 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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

1. In accordance with paragraph A.2. of the General Terms and conditions, the permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

#### **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-  
0.02 gr/dscf of exhaust gases  
  
Applicable Compliance Method-  
If required, compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(10).
  - b. Emission Limitation-  
4.25 tons/yr PE  
  
Applicable Compliance Method-  
Compliance shall be determined by multiplying the average hourly emission rate in pounds per hour of PE from the most recent compliance test by the maximum operating hours 8,760 and dividing by 2,000 lbs/ton. Until additional emission tests are conducted, the average emission rate of 0.97 lbs/hr shall be used in this calculation. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
  - c. Emission Limitation-  
5% visible emission opacity as a 3-minute average, from the stack  
  
Applicable Compliance Method-

**Lau Industries-Englewood Plant**

**PTI Application: 08-04521**

**Issued**

**Facility ID: 0857053116**

Emissions Unit ID: **P001**

Compliance shall be demonstrated through visible emissions observations in accordance with OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements**

1. The terms and conditions in PTI 08-04521 for emissions unit P001 will supercede those identified in PTI 08-3674 issued on August 13, 1997. This modification represents an increase in the PE of 1.34 TPY.