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Facility Name: **Stanley Electric U.S. Company, Inc**

Application Number: **01-7415**

Date: **January 21, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Stanley Electric U.S. Company, Inc** located in **Madison** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

			R018 (Mod)	
Ohio EPA Source <u>Number</u>	R007 (Mod)	R010 (Mod)		R019 (Mod)
R004 (Mod)				R019 (Mod cont'd)
	R007 (Mod cont'd)			
		R010 (Mod cont'd)		

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		R022 (Mod)		R023 Cont' d
	R021 (Mod)			
R020 (Mod)				
			R023 (Mod)	
R020 (Mod cont' d)				
	R021 (Mod cont' d)			
		R022 (mod cont' d)		

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	Undercoat Spray Booth, Line 3			
	Source Identif ication <u>Descrip tion</u>			Hardcoat Spray Booth #3
	Underco at Spray Booth, Line 1		Hardcoat Spray Booth #2	
		Primer Spray Booth, Booth #1		
	Undercoat Spray Booth, Line 4			

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Primer Spray Booth #4	Spraybooth with 1 infra-red oven and 1 ultra-violet oven	Spraybooth with 1 infra-red oven and 1 ultra-violet oven		

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Use of HVLP spray guns; Compliance with permitted emission limits and applicable rules

Use of HVLP spray guns; Compliance with permitted emission limits and applicable rules

Use of permanent total enclosure; Use of thermal incineration; 95% total control efficiency; Compliance with permitted limits and applicable rules

Use of permanent total enclosure; Use of thermal incineration; 95% total control efficiency; compliance with permitted limits and applicable rules

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				3745-21-07 (G) (2)
				3745-21-07 (G) (9)
	Applicable Federal & OAC Rules			
	3745-31-05		3745-31-05	
	3745-21-07 (G) (2)		3745-21-07 (G) (2)	
	3745-21-07 (G) (9)		3745-21-07 (G) (9)	
		3745-31-05		
		3745-21-07 (G) (2)		
		3745-21-07 (G) (9)		
				3745-31-05
	3745-31-05			3745-21-07 (G) (2)
	3745-21-07 (G) (2)			3745-21-07 (G) (9)
	3745-21-07 (G) (9)			

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3745-21-07
(G) (9)

3745-31-05
 3745-21-07
 3745-31-(G) (2)
 05 3745-21-07
 3745-21-(G) (9)
 07
 (G) (2)
 3745-21-
 07
 (G) (9)

3745-31-03
 3745-21-07
 (G) (2)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	using photochemically reactive materials; 2.00 lbs OC/hour; 7.30 tons OC/rolling 12-months; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;	240 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials; 4.80 lbs OC/hour; 11.13 tons OC/rolling 12-months; 7.30 tons OC/rolling 12-months when using photochemically reactive materials; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;	when using photochemically reactive materials; 5.81 lbs OC/hour; 11.69 tons OC/rolling 12-months; 7.30 tons OC/rolling 12-months when using photochemically reactive materials; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;
	40 pounds OC/day when using photochemically reactive materials; 2.00 lbs OC/hour; 7.30 tons OC/rolling 12-months; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;	4,062 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions; 240 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials; 2.00 lbs OC/hour; 7.30 tons OC/rolling 12-months; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;	0.035 lb. PM/hr.; 0.153 ton PM/yr.;	3,253 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions;
	4,062 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions; 240 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials;	2.00 lbs OC/hour; 7.30 tons OC/rolling 12-months; 0.035 lb. PM/hr.; 0.153 ton PM/yr.;	2,750 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions; 408 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials;	408 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials;
	240 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials;	4,062 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions;	408 gallons of cleanup/yr. 40 pounds OC/day	40 pounds OC/day when using photochemically reactive materials;

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5.81 lbs OC/hour ; 11.69 tons OC/rolling 12-months; 7.30 tons OC/rolling 12-months when using photo-chemically reactive materials; 0.035 lb. PM/hr. ; 0.153 ton PM/yr. ; 3,253 gal. coating/rolling 12-months, except	as per Section A in the Additional Special Terms & Conditions; 408 gallons of cleanup/yr. 408 gallons of cleanup/yr. 40 pounds OC/day when using photochemically reactive materials; 4.80 lbs OC/hour; 11.13 tons OC/rolling 12-months; 7.30 tons OC/rolling 12-month when using photo-chemically reactive materials; 0.035 lb. PM/hr. ; 0.153 ton PM/yr. ; 2,750 gal. coating/rolling 12-months, except as per	the Additional Special Terms & Conditions; 408 gallons of cleanup/yr. 2.40 lbs. OC/hr. ; 7.60 tons OC/rolling 12-months; 0.28 lb. PM/hr. ; 1.23 tons PM/yr. ; 59,904 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms & Conditions; 660 gallons of cleanup/yr. 0.690 lb. NO _x /hr. ; 2.582 tons NO _x /yr. ; 0.004 lb. SO ₂ /hr. ; 0.014 ton SO ₂ /yr. ; 0.139 lb. CO/hr. ; 0.522 ton CO/yr. ; 0.079 lb. PM/hr. ; 0.295 ton PM/yr. ; 0.037 lb. OC/yr. ; and 0.137 ton OC/yr. ; total from natural gas usage in incinerator and drying ovens (from R022 & R023)	2.40 lbs.OC/hr. ; 7.60 tons OC/rolling 12-months; 0.28 lb. PM/hr. ; 1.23 tons PM/yr. ; 59,904 gal. coating/rolling 12-months, except as per Section A in the Additional Special Terms and Conditions; 660 gallons of cleanup/yr. ; 0.690 lb. NO _x /hr. ; 2.582 tons NO _x /yr. ; 0.004 lb. SO ₂ /hr. ; 0.014 ton SO ₂ /yr. ; 0.139 lb. CO/hr. ; 0.522 ton CO/yr. ; 0.079 lb. PM/hr. ; 0.295 ton PM/yr. ;	0.037 lb. OC/yr. ; and 0.137 ton OC/yr. ; total from natural gas usage in incinerator and drying ovens (from R022 & R023)

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	82.877*
PM	3.825
NO _x	2.582
SO ₂	0.014
CO	0.522

* This is an increase of 37.48 tons/year from previously permitted amounts.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Coating Usage Limitations

Stanley Electric U.S. Company, Inc. (Stanley Electric) would like to retain the ability to replace their coatings with those of less toxicity and/or with a lower organic compound (OC) content. Therefore, a new coating, that passes the toxics policy as described in Section F and is approved by the Ohio EPA Central District Office, shall be limited in it's use as per the following formula:

Maximum coating use/hr.(in gal./hr.)= Source Limit/hr.(in lbs./hr.) x 1 gal./ y lbs. OC

Maximum coating use/yr.(in gal./yr)= Source limit/yr.-permitted cleanup emissions/yr. (tons/yr.-cleanup tons/yr) x 1 gal./y lbs.OC x 2000 lbs./ton

y=OC content of new coatings by weight (lbs.)

Until such a coating(s) is (are) submitted with analysis for approval, the maximum annual coating usage for the undercoat lines, emissions units R004, R007, and R010 shall not exceed 4,062 gallons and 7.3 tons of OC emissions per rolling 12-months for each source.

Until such coating(s) are submitted with analysis for approval, the maximum annual coating usage for the hardcoat lines, emissions units R019 and R020 shall not exceed 3,253 gallons and 11.69 tons of OC emissions per rolling 12-months for each source.

Until such coating(s) are submitted with analysis for approval, the maximum annual coating usage for the primer coat lines, emissions units R018 and R021 shall not exceed 2,750 gallons and 11.13 tons of OC emissions per rolling 12-months for each source.

Until such coating(s) are submitted with analysis for approval, the maximum annual coating usage for emissions units R022 and R023 shall not exceed 59,904 gallons and 7.60 tons of OC emissions per rolling 12-months for each source.

To ensure federal enforceability during the first 12

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calendar months of operation, these sources shall not exceed the coating usage levels and emission that would result in an exceedance of the monthly emission limitations defined in the following tables:

Sources	Month	Rolling 12-month coating usage(gal.) (lbs.)	Rolling 12-month OC Emissions (lbs.)
R004	1	338.5	1,216.7
R007 &	1-2	677.0	2,433.4
R010	1-3	1,015.5	3,650.1
(limits	1-4	1,354.0	4,866.8
for each)	1-5	1,692.5	6,083.5
	1-6	2,031.0	7,300.2
	1-7	2,369.5	8,516.9
	1-8	2,708.0	9,733.6
	1-9	3,046.5	10,950.3
	1-10	3,385.0	12,167.0
	1-11	3,723.5	13,383.7
	1-12	4,062.0	14,600.0

Sources	Month	Rolling 12-month coating usage(gal.)	Rolling 12-month OC Emissions (lbs.)
R018 &	1	229.1	1,855.0
R021	1-2	458.3	3,710.0
(limits	1-3	687.4	5,565.0
for each)	1-4	916.6	7,420.0
	1-5	1,145.7	9,275.0
	1-6	1,374.9	11,130.0
	1-7	1,604.0	12,985.0
	1-8	1,833.2	14,840.0
	1-9	2,062.3	16,695.0
	1-10	2,291.5	18,550.0
	1-11	2,520.6	20,405.0
	1-12	2,750.0	22,260.0

Sources	Month	Rolling 12-month coating usage(gal.)	Rolling 12-month OC Emissions (lbs.)
R019 &	1	271.1	1,948.3
R020	1-2	542.2	3,896.6
(limits	1-3	813.3	5,844.9
for each)	1-4	1,084.4	7,793.2

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1-5	1,355.5	9,741.5
1-6	1,626.6	11,689.8
1-7	1,897.7	13,638.1
1-8	2,168.8	15,586.4
1-9	2,439.9	17,534.7
1-10	2,711.0	19,483.0
1-11	2,982.0	21,431.3
1-12	3,253.0	23,380.0

Sources	Month	Rolling 12-month coating usage(gal.)	Rolling 12-month OC Emissions (lbs.)
R022 &	1	4,992.0	1,266.7
R023	1-2	9,984.0	2,533.4
(limits	1-3	14,976.0	3,800.1
for each)	1-4	19,968.0	5,066.8
	1-5	24,960.0	6,333.5
	1-6	29,952.0	7,600.2
	1-7	34,944.0	8,866.9
	1-8	39,936.0	10,133.6
	1-9	44,928.0	11,400.3
	1-10	49,920.0	12,667.0
	1-11	54,912.0	13,933.7
	1-12	59,904.0	15,200.0

If a new coating is submitted to the Ohio EPA Central District Office for review and approval, as per Section A and F of this permit, the above gallon monthly rolling limits shall be adjusted to correct for any increase in coating usage. This shall not include an increase in the rolling monthly emissions.

The total cleanup materials used in any source covered in this permit shall not exceed 0.5 gallons in any hour of time.

The terms and conditions of this permit shall supersede all the requirements for these sources contained in the Permits to Install numbered 01-2202, 01-5745, 01-6388, and 01-6693.

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B. Operational Restriction

The permittee shall control the emissions from emissions units R022 and R023, through the use of a Permanent Total Enclosure and a thermal incinerator with a minimum destruction and removal efficiency of 95%. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission units are in operation.

The minimum combustion temperature of the incinerator shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission units were in compliance.

C. Monitoring and Recordkeeping Requirements

Air emissions from cleanup/purge material usage, associated with operation of the emission units shall be reported and considered covered under this permit and included in coating emission estimations, performed for demonstrating compliance with the emission limits.

1. The permittee shall collect and record the following information each day for the coating operations from each source R004, R007, R010, R019, R020, R018, R021, R022, and R023:

- a. the company identification for each coating and cleanup material employed; documentation on the content of each; and identification of each as photochemically or nonphotochemically reactive;
- b. the number of gallons of each coating and cleanup material employed;
- c. the maximum amount of coating and cleanup material used in each source per hour, in gallons (or part gallon);

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- d. the organic compound content of each coating and cleanup material, in pounds per gallon;
- e. if a credit to emissions from recovered cleanup materials is to be used in "f" below, the number of gallons of cleanup material reclaimed for off-site recycle recovery and/or disposal from each source;
- f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for each source; for sources R022 and R023, emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted;
- g. the total number of hours each emissions unit and the incinerator were in operation; and,
- h. the average hourly organic compound emission rate for all coatings and cleanup materials from each source, i.e., (f)/(g), in pounds per hour (average).

2. The permittee shall collect and record emission records separately by days in which a photochemically reactive material is employed and by days in which only nonphotochemically reactive materials are employed for each coating source R004, R007, R010, R019, R020, R018, and R021. Records shall be maintained for each source as follows:

- a. for each day during which a photochemically reactive material is employed, the total organic compound emissions for all coatings and cleanup materials applied in the source, in pounds per day;
- b. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation;

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- c. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and cleanup materials used in the source, i.e., (a)/(b), in pounds per hour (average); and,
 - d. for all days during which photochemically reactive materials are not employed, the total organic compound emissions for all coatings and cleanup materials applied in the source, in pounds per day.
3. The permittee shall collect and record the following information at the end of each month for each of the coating sources R004, R007, R010, R019, R020, R018, and R021:
 - a. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in each source, during all days in which the source used a photochemically reactive material; and,
 - b. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in each source, during all days in which the source used only nonphotochemically reactive materials.
4. The permittee shall collect and record the following information at the end of each month for all the coating sources contained in this permit:
 - a. the rolling 12-month summation of total OC emissions from the coating and cleanup materials used in each source (tons OC/rolling 12-months); and,
 - b. the rolling 12-month summation of the amount of coating used in each source (gallons/rolling 12-months).
5. The permittee shall collect and record the following information at the end of each year for all sources contained in this permit:
 - a. the total amount of cleanup material used in each source per year, less any record of cleanup

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material sent off-site for recovery, recycle, and/or disposal (gallons/year).

6. 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 units R022 and R023 are 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 for the control equipment:

- 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance or less than 1,400 degrees Fahrenheit until initial emissions testing has been completed; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions units, R022 and R023, were in operation.
7. 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 surrounding R022 and R023. 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 the difference in pressure between the permanent total enclosure and the surrounding area(s) on a daily basis. This difference shall be maintained at 0.007 inches of water.

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8. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five (5) 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 the permit. Such records may be maintained in computerized forms.

D. Reporting Requirements

The permittee shall submit required reports in the following manner:

1. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports shall be submitted to the Ohio EPA Central District Office which include the following information:
 - a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per Method 204, when the emissions units R022 and/or R023 were in operation;
 - b. for the days during which a photochemically reactive material was employed in sources R004, R007, R010, R019, R020, R018, and R021, an identification of each day during which the average hourly organic compound emissions from all coatings and cleanup materials used in the source, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - c. for the days during which a photochemically reactive material was employed in sources R004, R007, R010, R019, R020, R018, and R021, an identification of each day during which the organic compound emissions from all coatings and cleanup materials used in the source, exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - d. an identification of each day during which the average hourly organic compound emission rate from coatings and cleanup materials exceeded the limits contained in this permit, and the

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- actual average organic compound emission rate for each such day;
- e. the identification of any exceedances of the hourly, daily, and/or annual coating or cleanup material usage limitations;
 - f. the identification of any rolling monthly record showing an exceedance of the annual emission limits from photochemically reactive coating and/or cleanup material of 7.3 tons of OC per rolling 12-months, from any source other than R022 and R023;
 - g. the identification of any rolling monthly record showing an exceedance of the annual OC emission limits from all coating and cleanup materials of 7.3 tons of OC per rolling 12 months from each of R004, R007, and R010; 11.13 tons of OC per rolling 12 months from each of R018 and R021; 11.69 tons of OC per rolling 12 months from each of R019 and R020; and 7.6 tons of OC per rolling 12 months from each of R022 and R023;
 - h. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions units R022 and/or R023 were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed;
 - i. any record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions units R022 and/or R023 were in operation;
 - j. 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; and,
 - k. the probable cause of any of the above deviations or exceedances, and any corrective actions or preventive measures which have been or will be taken.

These quarterly reports shall be submitted to the Ohio EPA Central

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District Office. 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.)

2. The permittee shall also submit annual reports of the following:
 - a. the total organic compound emissions from these emissions units for the previous calendar year. This report may be satisfied by including these sources in the submission of the annual Fee Emission Report.

E. Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Hourly Emission Limitation for Undercoat Lines R004, R007, and R010

2.0 lbs. OC/hr. per source

Hourly Emission Limitation for Primer Lines, R018 and R021

4.8 lbs. OC/hr. per source

Hourly Emission Limitation for Hardcoat Lines, R019 and R020

5.81 lbs. OC/hr. per source

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Hourly Emission Limitation for Coating Lines, R022 and R023

2.40 lbs. OC/hr. per source

Applicable Compliance Method

Compliance with each source hourly OC limit shall be determined through daily recordkeeping of coating and cleanup material usage, the organic compound content of each coating and cleanup material, and operating hours per day for these units. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Hourly emissions shall be calculated by multiplying the maximum OC content of the coating used in each source (lbs.OC/gallon of coating) times the coating's maximum usage in any hour (gallons/hr.). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours the source ran during that day. Calculations shall be documented as follows:

OC emissions/hr.= (OC/gal. of coating) x (maximum coating usage in gal./hr.) or as per above:

OC emissions/hr.= (OC/gal. of coating) x (coating usage in gal./day) x (1 day /hours of operation)

For sources R022 and R023, emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95 percent, until such time testing has been conducted. Therefore, the above emission calculation for R022 and R023 shall be multiplied by a factor of 5 percent, for 95 percent control until testing adjusts this factor.

For the purpose of quantifying OC emissions from cleanup and/or purge material usage and the reclamation and disposal of these materials, from each line, the following calculations shall be utilized:

Cleanup Emissions= $(a_i x_i - b_i y_i)$

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a_i = OC content of purge or cleanup material (lbs./gallon)

x_i = usage of purge or cleanup material in the source (gallons)

b_i = OC content of reclaimed purge and cleanup from the source (lbs./gallon)

y_i = quantity of purge and cleanup materials collected for off-site recovery and/or disposal from the source (gallons)

i = subscript denoting purge or cleanup material employed

2. Daily Emission Limitation for R004, R007, R010, R018, R019, R020 and R021

40.0 lbs. OC/day per source when using photochemically reactive materials.

Applicable Compliance Method

Compliance with the daily OC limits, when using photochemically reactive materials, shall be determined through daily recordkeeping of each coating and cleanup material used on each line and documentation on the chemical organic compound content of each coating and its photochemical reactive status. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used in any source, daily emissions shall be calculated by multiplying the maximum OC content of each material used in each source (lbs.OC/gallon of material) times the coating/cleanup material's usage in each source, each day (these amounts shall be summed if different coatings are used in any day). Calculations shall be documented for each line as follows:

OC emissions/day= (OC/gal.of coating) x (coating usage in gal./day) + (OC/gal.of cleanup material) x (cleanup material usage in gal./day-recovered cleanup for off-site disposal in gal./day)

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3. Annual OC limits

Annual Emission Limitation for Undercoat Lines R004, R007, and R010

7.30 tons OC/yr. per rolling 12-months, per source

Annual Emission Limitation for Primer Lines R018 and R021

11.13 tons OC/yr. per rolling 12-months, per source

Annual Emission Limitation for Hardcoat Lines R019 and R020

11.69 tons OC/yr. per rolling 12-months, per source

Annual Emission Limitation for Coating Lines R022 and R023

7.60 tons OC/yr. per rolling 12-months, per source

Applicable Compliance Method

Compliance with the annual OC limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used on each line and the organic compound content of each coating and cleanup material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual rolling emissions shall be calculated by adding the daily or monthly emissions derived from all coating and cleanup material's used in these sources. Annual rolling emissions shall be calculated from monthly emission calculations for each source and these amounts added to the previous rolling 11 months. Calculations shall be documented for each source as follows:

$$\text{Annual OC emission} = \sum_{i=1}^n (\text{lbs.OC/gal. of coating } i) \times (\text{coating}_i \text{ usage in gal./yr}) + (\text{lbs.OC/gal.of coating } n) \times (\text{coating}_n \text{ usage in gal./yr}) + (\text{OC/gal.of cleanup material}) \times (\text{cleanup material usage in gal./yr.})$$

i=type of coating for each source

n=number of types of coatings

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For sources R022 and R023, emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95 percent, until such time testing has been conducted. Therefore, the above emission calculation for R022, and R023 shall be multiplied by a factor of 5 percent, for 95 percent control until testing adjusts this factor.

4. Annual Emission Limitation when using photochemically reactive materials in sources R018, R019, R020 and R021

7.3 tons OC/rolling 12-months when using photochemically reactive materials

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through daily or monthly recordkeeping of each coating and cleanup material applied when using a photochemically reactive material on each line and the organic compound content of each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the daily or monthly emissions derived from all coating and cleanup material's use, when using any photochemically reactive material, as per Section E.2 of this permit. Annual emissions shall be calculated from monthly emission calculations for each source and these amounts added to the previous rolling 11 months. When using a photochemically reactive material, calculations shall be documented for each source as follows:

$$\text{Annual rolling OC emission} = \sum_{i=1}^n (\text{lbs.OC/gal.of coating}_i) \times (\text{coating}_i \text{ usage in gal./mo.}) + (\text{lbs.OC/gal.of coating}_n) \times (\text{coating}_n \text{ usage in gal./mo.}) + (\text{OC/gal.of cleanup material}) \times (\text{cleanup material usage in gal./mo. less cleanup credit for recovered materials}) + \text{previous 11 month calculation}$$

i=type of coating for each source

n=number of types of coatings

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5. Annual Rolling Coating and Cleanup Material Usage limitations

4,062 gallons of coating/rolling 12-months for R004, R007, and R010

2,750 gallons of coating/rolling 12-months for R018 and R021

3,253 gallons of coating/rolling 12-months for R019 and R020

59,904 gallons of coating/rolling 12-months for R022 and R023

These limits on the coating usage may change as per the formula in Section A, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used in each source. Rolling 12-month coating usage in each source shall be calculated each month by adding each new month's usage to the previous rolling 11-months.

6. Annual Cleanup Material Usage limitations

240 gallons of cleanup material/year for each of R004, R007, and R010

408 gallons of cleanup material/year for each of R018, R019, R020, and R021

660 gallons of cleanup material/year for each of R022 and R023

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through monthly recordkeeping of each cleanup material used in each source. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use, per source.

7. Hourly Cleanup Material Usage limitations

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0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the maximum cleanup material used in any one hour in each source.

8. Annual Emission Limitation for Particulate Matter

0.035 lbs. PM/hr. from each source R004, R007, R010, R018, R019, R020 and R021

0.153 tons PM/yr. from each source R004, R007, R010, R018, R019, R020 and R021

0.28 lbs. PM/hr. from coating, from each of R022 and R023

1.23 tons PM/yr. from coating, from each of R022 and R023

Applicable Compliance Method

Compliance with the hourly PM limits shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for these units. Formulation data from the manufacture's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in each source (2 lbs. PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hr.). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr. = (2.0 lbs. PM/gal. of coating) x (coating usage in gal./hr.) x (1-TE) x (1-CE) or (per above)

PM emissions/hr. = (2.0 lbs. PM/gal. of coating) x (coating usage in gal./day) x (1 day/hours of operation) x (1-TE) x (1-CE) and

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Annual PM emissions (in tons/yr.)= (2.0 lbs. PM/gal. of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) x 1 ton/2000 lbs.

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

Since 2.0 pounds of PM per gallon represents the maximum solids content of any coating used in any source, if one gallon or less of any coating has been used during every hour of the day in sources R004, R007, R010, R019, R020, R018, and R021 and if 8 gallons or less of any coating has been used during every hour of the day in sources R022 and R023 (using present coatings, all sources use the amount referenced or less), the emissions from these coatings for these hours can be calculated for the estimated emissions or assumed to be equal to and recorded as the limit, since:

0.035 lbs.PM/hr.= 2.0 lbs.PM/gal x 1.0 gal./hr. x (1-65%) x (1-95%)

0.153 tons PM/yr.= 2.0 lbs.PM/gal x 1.0 gal./hr. x 8760 hrs./year x (1-65%) x (1-95%) x (1 ton/2000 lbs.)

0.28 lbs.PM/hr.= 2.0 lbs.PM/gal x 8.0 gal./hr. x (1-65%) x (1-95%)

1.23 tons PM/yr.= 2.0 lbs.PM/gal x 8.0 gal./hr. x 8760 hrs./year x (1-65%) x (1-95%) x (1 ton/2000 lbs.)

9. Emission limitation from natural gas drying ovens and incinerator (from R022 & R023 together)

0.690 lb. NOx/hr.
 2.582 tons NOx/yr.
 0.004 lb. SO₂/hr.
 0.014 tons SO₂/yr.
 0.139 lb. CO/hr.
 0.522 tons CO/yr.
 0.079 lb. PM/hr.

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0.295 tons PM/yr.

0.037 lb. OC/yr.

0.137 tons OC/yr.

Applicable Compliance Method

Compliance with these limits shall be determined through daily recordkeeping of the number of hours of operation for sources R022 and R023 and their control device, the incinerator. These limits represent the maximum hourly natural gas usage of the incinerator and drying ovens. These emission limitations were determined by multiplying the natural gas usage (MM ft³) by the AP-42 and/or AIRS emission factor of each pollutant (lbs./MM ft³). Emissions from natural gas use shall be calculated as follows:

NOx Limits

Hourly NOx emissions from incinerator = 100 lbs.
 $\text{NOx}/10^6\text{ft}^3$ (emission factor) x 6000 ft³/hr. (max. capacity of incinerator) plus

Hourly NOx emissions from drying oven = 140 lbs.
 $\text{NOx}/10^6\text{ft}^3$ (emission factor) x 320 ft³/hr. (max. capacity of drying oven) x 2 (sources)

Annual NOx emissions from incinerator = 100 lbs.
 $\text{NOx}/10^6\text{ft}^3$ (emission factor) x 6000 ft³/hr. (max. capacity of incinerator) x hrs. of operation/yr. x 1 ton/2000 lbs. plus

Annual NOx emissions from drying oven = 140 lbs.
 $\text{NOx}/10^6\text{ft}^3$ (emission factor) x 320 ft³/hr. (max. capacity of drying oven) x hrs. of operation/yr. x 1 ton/2000 lbs. x 2 (sources)

SO₂ Limits

Hourly SO₂ emissions from incinerator = 0.6 lbs.
 $\text{SO}_2/10^6\text{ft}^3$ (emission factor) x 6000 ft³/hr. (max. capacity of incinerator) plus

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Hourly SO₂ emissions from drying oven = 0.6 lbs.
SO₂/10⁶ft³ (emission factor) x 320 ft³/hr.(max. capacity
of drying oven) x 2 (sources)

Annual SO₂ emissions from incinerator = 0.6 lbs.
SO₂/10⁶ft³ (emission factor) x 6000 ft³/hr.(max. capacity
of incinerator) x hrs. of operation/yr. x 1 ton/2000
lbs. plus

Annual SO₂ emissions from drying oven = 0.6 lbs.
SO₂/10⁶ft³ (emission factor) x 320 ft³/hr.(max. capacity
of drying oven) x hrs. of operation/yr. x 1 ton/2000
lbs. x 2 (sources)

CO Limits

Hourly CO emissions from incinerator = 21 lbs.
CO/10⁶ft³ (emission factor) x 6000 ft³/hr.(max. capacity
of incinerator) plus

Hourly CO emissions from drying oven = 21 lbs.
CO/10⁶ft³ (emission factor) x 320 ft³/hr.(max. capacity
of drying oven) x 2 (sources)

Annual CO emissions from incinerator = 21 lbs.
CO/10⁶ft³ (emission factor) x 6000 ft³/hr.(max. capacity
of incinerator) x hrs. of operation/yr. x 1 ton/2000
lbs. plus

Annual CO emissions from drying oven = 21 lbs.
CO/10⁶ft³ (emission factor) x 320 ft³/hr.(max. capacity
of drying oven) x hrs. of operation/yr. x 1 ton/2000
lbs. x 2 (sources)

PM Limits

Hourly PM emissions from incinerator = 11.9 lbs.
PM/10⁶ft³ (emission factor) x 6000 ft³/hr.(max. capacity
of incinerator) plus

Hourly PM emissions from drying oven = 11.9 lbs.
PM/10⁶ft³ (emission factor) x 320 ft³/hr.(max. capacity
of drying oven) x 2 (sources)

Annual PM emissions from incinerator = 11.9 lbs.

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$PM/10^6ft^3$ (emission factor) x 6000 $ft^3/hr.$ (max. capacity of incinerator) x hrs. of operation/yr. x 1 ton/2000 lbs. plus

Annual PM emissions from drying oven = 11.9 lbs.
 $PM/10^6ft^3$ (emission factor) x 320 $ft^3/hr.$ (max. capacity of drying oven) x hrs. of operation/yr. x 1 ton/2000 lbs. x 2 (sources)

OC Limits

Hourly OC emissions from incinerator = 5.8 lbs.
 $OC/10^6ft^3$ (emission factor) x 6000 $ft^3/hr.$ (max. capacity of incinerator) plus

Hourly OC emissions from drying oven = 2.8 lbs.
 $OC/10^6ft^3$ (emission factor) x 320 $ft^3/hr.$ (max. capacity of drying oven) x 2 (sources)

Annual OC emissions from incinerator = 5.8 lbs.
 $OC/10^6ft^3$ (emission factor) x 6000 $ft^3/hr.$ (max. capacity of incinerator) x hrs. of operation/yr. x 1 ton/2000 lbs. plus

Annual OC emissions from drying oven = 2.8 lbs.
 $OC/10^6ft^3$ (emission factor) x 320 $ft^3/hr.$ (max. capacity of drying oven) x hrs. of operation/yr. x 1 ton/2000 lbs. x 2 (sources)

Since these limits represent the maximum hourly capacity of the equipment, no additional compliance determination is required beyond the daily recordkeeping of hours of operation.

10. Controlled Coating Emission Limitation from R022 and R023

2.4 pounds of OC/hour for each emission unit R022 and R023
 7.60 tons OC/year for each emission unit R022 and R023

Applicable Compliance Method

The permittee shall conduct, or have conducted within 90 days of startup, emission testing for emissions units R022 and R023. Compliance with these emission limitations shall be demonstrated through the records

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required pursuant to Section C and the emission testing requirement specified below.

- a. Emission testing shall be conducted to demonstrate compliance with 100% capture efficiency (total enclosure requirements) and 95% destruction efficiency limitations of organic compounds (OC) and the allowable mass emission rate of 2.40 pounds of OC per hour for emissions units R022 and R023 in accordance with the following requirements:
 - i. the emission testing shall be conducted within 6 months after issuance of the permit and within 3 months prior to permit renewal (Title V monitoring requirements may replace one or both of these testing schedules, depending on it's date of issue);
 - ii. the following test methods shall be employed to determine the overall control efficiency of the control equipment serving this emission unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A and 40 CFR Part 51, Appendix M, Method 204; and,
 - iii. the test(s) shall be conducted while these emission units are venting OC emissions to the thermal incinerator and while the emission units are operating at their maximum capacity, unless otherwise specified or approved by the Ohio EPA Central District Office.
- b. The overall control efficiency of the incinerator for emissions units R022 and R023 shall be demonstrated based upon the results of the capture efficiency (permanent total enclosure) and control efficiency tests. The capture efficiency or verification of permanent total enclosure shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider

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the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in E.1.b. above and OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units 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 Central District Office's refusal to accept the results of the emission test(s).
- d. Personnel from the Ohio EPA Central District Office 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.
- e. 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 Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the

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written report, where warranted, with prior approval from the Ohio EPA Central District Office.

F. Toxics Policy Requirements

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 01-7415. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 2C model and a comparison of the predicted 1 hour maximum ground-level concentration of the toxic with the highest concentration represented in all coatings and cleanup materials to the lowest Threshold Limit Value (TLV) ($152\text{mg}/\text{m}^3$) and lowest maximum acceptable ground-level concentration Maximum Ground-Level Concentration (MAGLC) ($3.62\text{ mg}/\text{m}^3$).

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Central District Office is required, including the possible issuance of modifications to PTI number 01-7415 and the operating (or Title V) permit:

1. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 used to model these sources ($152\text{mg}/\text{m}^3$);
2. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC of any toxic contained in the coatings or cleanup materials;

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3. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and
4. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

A modification to this PTI shall not be required if Stanley Electric can demonstrate compliance with the toxics policy and provide proof that criteria pollutant limits are not exceeded, as required by this permit. When it is determined that a new coating or cleanup material will be used in a source, Stanley Electric shall ensure that the new coating and/or cleanup material is in compliance with the toxics policy by either passing an air toxics model or by ensuring that the toxics contained in the new formulation of new coating/cleanup materials are at concentrations below the levels submitted with this permit. The air toxics model and coating analysis for any new coating or cleanup material, which is completed to insure compliance with the toxics policy, shall be submitted to the Ohio EPA Central District Office and must be retained at the facility as long as the coating/cleanup material is in use at the facility. The Ohio EPA shall review and approve or disapprove the use of each new material within 30 days of receiving the new coating/cleanup analysis.

G. Miscellaneous Condition

The term entitled "Permit to Operate Application" will be satisfied by adding these sources, through an update, to the Title V application which has already been submitted.