



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 05-14094

Fac ID: 0546010011

DATE: 9/8/2005

Glacier Daido America, L.L.C.
Kevin Papich
1215 Greenwood Street
Bellefontaine, OH 43311

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/8/2005
Effective Date: 9/8/2005**

FINAL PERMIT TO INSTALL 05-14094

Application Number: 05-14094
Facility ID: 0546010011
Permit Fee: **\$1000**
Name of Facility: Glacier Daido America, L.L.C.
Person to Contact: Kevin Papich
Address: 1215 Greenwood Street 1215 Greenwood Street
Bellefontaine, OH 43311

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

**1215 Greenwood Street
Bellefontaine, Ohio**

Description of proposed emissions unit(s):

Modification to P031 bi-Metalic coil operation to increase emissions.

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

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Emissions Unit ID: P031

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	3.72
VOC	0.91

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>
P031 - Bi-metallic bonding (terms in this permit supercede those of PTI 05-12043 issued on 5/21/2002)	OAC rule 3745-31-05(A)(3)	0.85 lbs particulate emissions (PE)/hr and 3.72 tons PE/yr from the baghouse stack.
		5% Opacity, as a six minute average, from the baghouse stack.
		0.91 ton uncontrolled VOC/yr.*
		20% Opacity, as a three minute average, from any building exhaust associated with this emissions unit.
	OAC 3745-17-07 (A)(1)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-11(B)(1)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05 (A)(3).

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Issued: 9/8/2005

Emissions Unit ID: **P031**

*VOC from lubricating oil
emissions (Assumed as 100%
VOC worst case).

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05 shall be demonstrated by the following:

1. the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE by venting particulate emissions to a baghouse; and
2. compliance with the limits in term II.A.1.

2.b The annual VOC emissions limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping, and reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 7 inches of water while any emission unit controlled by the baghouse 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, 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 weekly basis.
2. This facility shall continue operating an ambient lead monitoring network in the vicinity of the plant in Bellefontaine, Ohio, consisting of a minimum of four (4) sites. The lead monitoring instruments shall be operated on the same schedule as the Ohio air sampling network in accordance with the following requirements:
 - a. The facility shall follow the operating procedures identified in 40 CFR Part 50 and Part 58, and the "Quality Assurance Handbook for Air Pollution Measurement Systems" Volume I - Principals (EPA 600/9-76-005) and Volume II- Ambient Air Specific Methods (EPA 600/4-77-027a).

- b. The lead samples shall be analyzed as specified in 40 CFR, Part 50, Appendix G.
- c. The flow rate of each instrument shall be calibrated every 500 hours or operation and after any instance of major repair or maintenance.
- d. An operator's log book shall be maintained for each site location with a format and content as specified in guidance provided by the Ohio EPA.

This facility shall meet the quality assurance activities specified in 40 CFR, Part 58, Appendix B except that at least one (1) collocated site will be maintained, one of which will be at the site with the highest expected 24-hour lead pollutant concentration. Independent audit results (accuracy) and precision results must be submitted to the Ohio EPA/ Southwest District office, within 18 days of the end of each calendar quarter beginning with the first quarter of 2002. Equipment siting and performance specifications must be in accordance with "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD) ", EPA-45-/4-80-012.

The Ohio EPA Technical Services Section and the Ohio EPA Southwest District office field personnel shall be provided with access to each site location. The site operator and/or supervisor shall accompany the Technical Services Section and/or the Ohio EPA Southwest District field office personnel on any site inspections or audit and respond to inquiries regarding instrument operations and maintenance.

Appropriate corrective actions must be taken by the facility following the identification of any problems by the independent auditor, or by the Technical Services Section or the OEPA Southwest District office personnel.

All air quality measurement data shall be reported to the Technical Services Section of the Ohio EPA, Division of Air Pollution Control in Columbus, within 18 of the end of each calendar quarter. All such data shall be submitted in AIRS format in a manner compatible for direct entry into the Ohio EPA Ambient Air Quality Data Handling System.

This facility shall continue to operate the lead ambient monitoring network as described in this permit condition through the end of calendar year 2007. The Director may extend the terms of this monitoring requirement. In determining the need for such an extension, the Director shall consider the concentrations measured by the monitors, the trends in air quality concentrations, any soil contamination, and the value of the air quality data in fulfilling the goals and requirements of the Federal Clean Air Act and

Chapter 3704 of the Ohio Revised Code.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in term II. B. 1.

E. Testing Requirements

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

1. Emission Limitation:

0.85 lb PE/hr

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the outlet grain loading (0.01 gr/dscf) by the maximum airflow through the bag house (10,000 acfm), by the conversion factor for acfm to dscf using a stack gas temperature of 75°F $[(460^{\circ}\text{R} + 70) / (460^{\circ}\text{R} + \text{stack gas temp.})]$, by 60 minutes per hour and dividing by 7000 gr/lb.

2. Emission Limitation:

3.72 ton PE/yr

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the outlet grain loading (0.01 gr/dscf) by the maximum airflow through the bag house (10,000 acfm), by the conversion factor for acfm to dscf using a stack gas temperature of 75°F $[(460^{\circ}\text{R} + 70) / (460^{\circ}\text{R} + \text{stack gas temp.})]$, by 60 minutes per hour and the annual hour of operation and dividing by 7000 gr/lb and 2000 lbs/ton.

3. Emission Limitation:

5% opacity, as a six-minute average, from the baghouse stack.

Applicable Compliance Method:

Compliance shall be determined according to test method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60.

4. Emission Limitation:

20% Opacity, as a three minute average, from any building exhaust associated with this emissions unit.

Applicable Compliance Method:

40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building.

5. Emission Limitation:

0.91 tons of VOC per year (as lubricating oil compound)

Applicable Compliance Method:

$(U) (D) (CONV) = 0.91 \text{ tons VOC/yr}$

Where:

U = usage of lubricating oil compound per year (1825lbs/year)

D = density of lubricating oil compound (100% VOC worst case)

CONV= conversion factor (1 ton/2000 lbs.)

F. Miscellaneous Requirements

1. This emissions unit shall not cause or contribute to an exceedance of the National Ambient Air Quality Standards for lead.