

Page 2 of 21

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

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.

Page 3 of 21

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

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 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.

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.

Page 4 of 21

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

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.

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Florida Production Engineering - Athens** located in **Athens** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R001 (mod)	Spray Booth # 1-Permit Modification	Use of High volume, low pressure spray guns except when prohibited by customer demands or specifications.	3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which only non-photochemically reactive materials are employed, and shall not exceed 61.32 TPY. Combined emissions from R001, R002, R003, and R004 shall not exceed 100 TPY.
R001 (mod) Cont'd			3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. Maximum

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

<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>
			3745-17-11	emissions of particulate matter shall not exceed 0.551 pounds per hour and 2.41 TPY.
			3745-21-07 (G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.
R002 (mod)	Spray Booth # 2-Permit Modification	Use of High volume, low pressure spray guns except when prohibited by customer demands or specifications.	3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which only non-photochemically reactive materials are employed, and shall not exceed 61.32 TPY. Combined emissions from R001, R002, R003, and R004 shall not exceed
R002 (mod) Cont'd				

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

<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>
				100 TPY.
			3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
			3745-17-11	Maximum emissions of particulate matter shall not exceed 0.551 pounds per hour and 2.41 TPY.
			3745-21-07 (G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.
R002 (mod) Cont'd				
R003 (mod)		Use of High volume, low pressure spray	3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

<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>
R003 (mod) Cont'd	Spray Booth # 3-Permit Modification	guns except when prohibited by customer demands or specifications.	3745-17-07(A)	during which only non-photochemically reactive materials are employed, and shall not exceed 61.32 TPY. Combined emissions from R001, R002, R003, and R004 shall not exceed 100 TPY.
			3745-17-11	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
			3745-21-07 (G)(2)	Maximum emissions of particulate matter shall not exceed 0.551 pounds per hour and 2.41 TPY.
				Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

<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>
R004 (mod)				materials (as defined in OAC 3745-21-01(C) (5)) are employed in this emissions unit.
R004 (mod) Cont'd	Spray Booth # 4-Permit Modification	Use of High volume, low pressure spray guns except when prohibited by customer demands or specifications.	3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which only non-photochemically reactive materials are employed, and shall not exceed 61.32 TPY. Combined emissions from R001, R002, R003, and R004 shall not exceed 100 TPY.
			3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
			3745-17-11	Maximum emissions of particulate matter shall not exceed 0.551

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

<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>
R004 (mod) Cont'd			3745-21-07 (G)(2)	pounds per hour and 2.41 TPY. Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	100
Particulate	9.64

CONSTRUCTION STATUS

The **Ohio EPA, Southeast District Office** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **R001, R002, R003, and R004.**

Page 11 of 21

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

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, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

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

Page 12 of 21

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

cause a public nuisance in violation of OAC Rule 3745-15-07.

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations

1. See Air Emission Summary section

B. Operational Restrictions

1. The total quantity of OC's applied in R001, R002, R003 and R004 shall not exceed 100 tons per rolling 12-month period.
2. The total quantity of OC's applied in R001, R002, R003 and R004 shall not exceed 8.33 tons per month.
3. The permittee shall comply with the rolling 12-month OC limitation and monitoring and recordkeeping requirements immediately upon issuance of this permit, by use of data from the previous 12 months of operation.

C. Monitoring and/or Recordkeeping Requirements

2. The permittee shall collect and record the following information each day photochemically reactive coatings and/or cleanup materials are employed.
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- g. Whether or not the spray booth filter was in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each day non-photochemically reactive coatings and/or cleanup materials are employed.
- a. The company identification for each coating and non-photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and non-photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and non-photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and non-photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and non-photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- g. Whether or not the spray booth filter was in

service when the emissions unit was in operation.

3. The permittee shall maintain monthly records of the following information:
 - a. The coating usage for each month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for each spray booth:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. On days when only non PRM's were employed, an identification of each day during which the average hourly organic compound emissions from the coatings and non-photochemically reactive cleanup materials exceeded 14.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

- d. An identification of each day during which the emissions unit was in operation and the spray booth filter was not in service.
- e. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitation. These reports are due by the date described in the Miscellaneous section below.

E. Testing Requirements

1. Compliance with the emission limitation of 8 pounds per hour shall be based on the recordkeeping specified in Section D.1. of this permit.
2. Compliance with the emission limitation of 40 pounds per day shall be based on the recordkeeping specified in Section D.1. of this permit.
3. Compliance with the emission limitation of 14.0 pounds per hour (and 61.32 tons/year) shall be based on the record keeping specified in Section D.2. of this permit.
4. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials.
5. Compliance with the particulate matter emission limit shall be determined by multiplying the maximum uncontrolled emission rate for particulates (lb PM/hr) by the design control efficiency of the filters (95%) and the transfer efficiency (50%) as follows:

$$(\text{lb PM/gal})(\text{gal/hr})(1 - 0.95\text{CE})(1-0.5\text{TE})= \text{lb PM/hr}$$

The hourly PM emission limit cannot be exceeded if a spray booth filter having a design control efficiency for particulates greater than 95% is employed during any operation of the emissions unit.

6. Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

F. Miscellaneous Requirements

1. Monitoring and Related Recordkeeping and Reporting Requirements
 - a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
 - b. 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.

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
- i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.

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.

Facility Name: **Florida Production Engineering - Athens**

Application Number: **06-5609**

Date: **Draft PTI (Date will be entered upon final issuance)**

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements.

If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Air Toxics Requirements

a. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5609. In conjunction with the best available technology requirements of OAC rule 3745-31-05. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Xylene
TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (pounds/hour): 0.3744
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 82.12
Maximum Acceptable Ground-Level Concentration (MAGLC)(ug/m3): 10,333

Pollutant: Ethyl Acetate

Facility Name: Florida Production Engineering - Athens

Application Number: 06-5609

Date: Draft PTI (Date will be entered upon final issuance)

TLV (ug/m3): 1,440,000
Maximum Hourly Emission Rate (pounds/hour): 4.7008
Predicted 1 Hour Maximum Ground-Level Concentration
at the Fenceline (ug/m3): 971.6
Maximum Acceptable Ground-Level Concentration
(MAGLC)(ug/m3): 34,285.7

Pollutant: Methyl Ethyl Ketone
TLV (ug/m3): 590,000
Maximum Hourly Emission Rate (pounds/hour): 7.0928
Predicted 1 Hour Maximum Ground-Level Concentration
at the Fenceline (ug/m3): 1459.6
Maximum Acceptable Ground-Level Concentration
(MAGLC)(ug/m3): 14,047.6

Pollutant: Tolulene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (pounds/hour): 1.8096
Predicted 1 Hour Maximum Ground-Level Concentration
at the Fenceline (ug/m3): 377.24
Maximum Acceptable Ground-Level Concentration
(MAGLC)(ug/m3): 4,476.2

- b. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the Ohio EPA Southeast District Office:
- i. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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 specified in the above table;
 - ii 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);
 - iii. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic

compounds included in the definition of "VOC"
[OAC rule 3745-21-01(B)(6)];

- iv. 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); and,
 - v. for any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.
3. The applicant has requested federally enforceable terms with restrictions be imposed in order to limit the potential to emit and, therefore, avoid future possible PSD applicability.