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Facility Name: **ITT Automotive, Inc. - New Lex Plant**

Application Number: **06-5707**

Date: **March 3, 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.

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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.

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**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.

**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: **ITT Automotive, Inc. - New Lex Plant**Application Number: **06-5707**Date: **March 3, 1999**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **ITT Automotive, Inc. - New Lex Plant** located in **Perry** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K004	Offline Procoat System	Thermal oxidizer	3745-31-05 3745-21-09 (B)(6)	Emissions of volatile organic compounds (VOC) from the coating operation shall not exceed 1.6 pounds per hour nor 6.9 TPY.  This coating operation shall be located within a total enclosure which is vented to a thermal oxidizer with a destruction efficiency of at least 90% and an overall control efficiency of at least 81%.
			3745-17-11	Emissions of particulate matter shall not exceed 0.551 pounds per hour nor 2.4 TPY.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K004 cont'd			3745-17-07	Visible emissions of particulate matter shall not exceed 20% opacity, except as provided by rule.
K006	#3 Inline Procoat System	Thermal oxidizer	3745-31-05 3745-21-09 (B)(6)	Emissions of volatile organic compounds (VOC) from the coating operation shall not exceed 2.3 pounds per hour nor 9.8 TPY.  This coating operation shall be located within a total enclosure which is vented to a thermal oxidizer with a destruction efficiency of at least 90% and an overall control efficiency of at least 81%.
			3745-17-11	Emissions of particulate matter shall not exceed 0.551 pounds per hour nor 2.4 TPY.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K006 cont'd			3745-17-07	Visible emissions of particulate matter shall not exceed 20% opacity, except as provided by rule.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	19.9
Particulate Matter	4.8

**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, Ohio 433138.**

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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 Southeast District Office, 2195 Front Street, Logan, Ohio 433138.**

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.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **A. OPERATING RESTRICTIONS**

1. Cleanup solvents used on K004, K006, and K007 shall not include hazardous air pollutants (HAP).
2. Emissions from cleanup shall not exceed 525 pounds VOC per month from K004, K006, and K007 combined.

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3. Emissions from the coating line shall be totally captured and vented to the thermal incinerator. The combustion chamber temperature of the thermal incinerator shall be maintained at 1300 degrees Fahrenheit or greater during any operation of this emissions unit.

**B. MONITORING AND RECORDKEEPING REQUIREMENTS FOR CLEANUP SOLVENTS**

1. The permittee shall collect and record the following information for each month for all cleanup solvents used in K004, K006, and K007:
  - a. the company identification for each cleanup material employed;
  - b. documentation that the cleanup material contains no HAP;
  - c. the number of gallons of each cleanup material employed;
  - d. the organic compound content of each cleanup material, in pounds per gallon; and,
  - e. the total organic compound emission rate for all cleanup materials, in pounds per month.

**C. MONITORING REQUIREMENTS FOR THE THERMAL OXIDIZER**

1. The permittee shall operate and maintain a temperature monitor which measures the thermal incinerator combustion chamber temperature when the coating line is in operation. Units shall be in degrees Fahrenheit. The monitoring device shall be capable of accurately measuring the combustion chamber temperature. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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**D. RECORDKEEPING REQUIREMENTS FOR THE THERMAL OXIDIZER**

1. The combustion chamber temperature of the thermal incinerator shall be observed and recorded in the operating log for the coating line once per shift when the line is in operation. For any temperature reading less than the value in Section A.3 above, the permittee shall also record the reason for the low temperature (if known) and the corrective action(s) taken.

**E. REPORTING REQUIREMENTS**

1. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the volatile organic compound emissions from the cleanup materials exceeded 525 pounds, and the actual volatile organic compound emissions for each such month. This report shall be submitted within 30 days after the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all times during which the observed combustion chamber temperature within the thermal incinerator does not comply with the minimum combustion chamber temperature specified in Section A.3.

**F. COMPLIANCE DETERMINATIONS**

1. Compliance with the 1.6 pounds VOC per hour limit for K004 shall be based on the results of the most recent emission test conducted for this emissions unit. Maximum uncontrolled VOC emissions are  $(6.16 \text{ \#/gal})(1.35 \text{ gal/hr}) = 8.3 \text{ \#/hr}$  and as long as the overall control efficiency of the thermal oxidizer is at least 81%, as required, the VOC emission rate cannot exceed  $(8.3 \text{ \#/hr})(0.19) = 1.58 \text{ \#/hr}$ . Therefore, no record keeping for coating usage is needed.
2. Compliance with the 2.3 pounds VOC per hour limit for K006 shall be based on the results of the most recent emission test conducted for this emissions unit. Maximum uncontrolled VOC emissions are  $(6.16 \text{ \#/gal})(1.92 \text{ gal/hr}) = 11.83 \text{ \#/hr}$  and as long as the overall control efficiency of the thermal oxidizer is at least 81%, as

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required, the VOC emission rate cannot exceed  $(11.83 \text{ \#/hr})(0.19) = 2.25 \text{ \#/hr}$ . Therefore, no record keeping for coating usage is needed.

3. Compliance with the emission limitations of 525 pounds VOC per month from cleanup activities shall be based upon the recordkeeping specified in section B.
4. Compliance with the emission limitations of 0.551 pounds particulate matter per hour and the visible emission limitation of 20% opacity shall be based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 6 months of the Permit to Install issuance date;
  - b. the emission testing shall be conducted to demonstrate compliance with the control requirements for VOC;
  - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25A. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitation and control efficiency limitation for K004 and K006 are specified below;
  - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office; and,
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request

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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 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 OAC rule 3745-21-10 or the approved alternative test protocol (e.g., the mass balance protocol approved on 10/25/95). 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.

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 Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit 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 Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Southeast 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.

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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 Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

**G. MISCELLANEOUS REQUIREMENT**

1. This permit to install shall supersede all previous permits issued for K004 and K006.