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Facility Name: SPECTRA PRECISION

Application Number:08-1825

Date: **October 20, 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 the above described source of environmental pollutants.

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 INSTALL FEE

The specified permit fee must be remitted within 15 days of the effective date of this permit to install.

CONSTRUCTION OF NEW SOURCES

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

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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 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 prove to be inadequate or cannot meet applicable standards.

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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Date: **October 20, 1999**AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **SPECTRA PRECISION** located in **Montgomery** County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P006	Flo-thru oven	Use of n.g. fuel & neg. emissions of combustion gases	3745-17-10	0.02 lb/10 ⁶ BTU input particulates, 0.35 TPY NO _x , 0.07 TPY CO
L002	Vapor degreaser (T-36)	Compliance w/ equipment specs. req. by OAC 3745-21-09(0)(3); restricted (min.) solvent usage; records	3745-21-09(0)(3)	0.1 TPY organic compounds
K004	Paint spray booth #1	Less than 10 gal/day material usage, including clean-up solvent; recordkeeping/reporting req.; R&D term	3745-21-09 (U)(2)(e)	3 TPY organic compounds, including clean-up
K005	Paint spray booth #2	Less than 6 gal/day coating usage; recordkeeping/reporting req; R&D term	Same as above	Same as above
K006	InstaPak 715 machine	Compliance w/ specified allowable emission rates; enclosed design; recordkeeping	3745-21-07(G)(2)	2 lbs/hr, less than 1 TPY organic compounds

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compounds	7.1
Particulates	0.07
NO _x	0.35
CO	0.07

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

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.

REPORTING

Any reports required by the Permit to Install shall be submitted to REGIONAL AIR POLLUTION CONTROL AGENCY, 451 West Third Street, Dayton, OH 45422.

PERMIT TO OPERATE APPLICATION

A Permit to Operate Application and a \$15 application fee must be submitted to the appropriate field office for each source in this Permit to Install. In accordance with OAC rule 3745-35-02, the application shall be made at least ninety days prior to start-up of the source.

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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.

MALFUNCTION/ABATEMENT

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The application of coating in K005 shall not exceed 6 gallons per day.
2. The application of materials in K004 shall not exceed 10 gallons per day.
3. This facility shall maintain monthly records which list the following information for each material employed in sources K004, K005 and K006:
 - a. the company identification of the materials;
 - b. the number of gallons employed;
 - c. the volatile organic compound (VOC) content, in percent by volume;
 - d. the solids content, in percent by volume;
 - e. the water content, in percent by volume; and,
 - f. density of the volatile organic solvents, pounds per gallon.

These monthly records, as well as any supporting analyses and computations, shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or authorized representative of the Director for review during normal business hours.

4. This facility shall submit semi-annual reports to the Regional Air Pollution Control Agency which summarize the following information for each material employed in sources K004 and K005 during the previous six calendar months: company identification of the material, the total number of gallons employed, the VOC content (in pounds VOC per gallon of coating, minus water), the water content and the nonvolatile (solids) content. Included in this semi-annual report will be an accounting of clean-up solvent used in these sources. The reports shall be submitted by February 15 and August

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15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

5. Spectra Precision shall initiate and pursue a coating reformulation program to develop coatings that are lower in VOC content. Annual reports which document this on-going research and development shall be submitted to RAPCA. The reports shall contain, at a minimum, letters from coating suppliers outlining current efforts, results of any trial coating application, and any projected use of an alternative coating. Upon successful trial of a new coating, Spectra Precision shall begin to utilize the lower VOC content coating. Reports shall be due February 15 of each year.
6. The solvent employed in source L002 shall be limited to 15 gallons per year of replacement solvent. This facility shall maintain records documenting:
 - a. the amount (gallons) of solvent used to replenish the vapor degreaser each year; and,
 - b. the amount (gallons) of solvent disposed of each year.

These records shall be kept in the company's files for a period of at least two years and shall be made available for review during normal business hours.

7. Pursuant to OAC rule 3745-21-09(0)(3), the above identified source, L002 (open top vapor degreaser), shall:
 - a. be equipped with a cover that can be opened and closed easily without disturbing the vapor zone;
 - b. have in operation the following safety switches:
 1. a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm;
 2. a water flow switch, water pressure switch or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored;
 3. A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high;
 - c. have one of the following devices:

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1. a freeboard with a freeboard ratio greater than or equal to 0.75, and if the degreaser opening is greater than ten square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use;
 2. refrigerated chiller;
 3. enclosed design (cover or door opens only when the dry part is actually entering or exiting the degreaser); or
 4. carbon adsorption system, with ventilation greater than or equal to fifty cubic feet per minute per square foot of air/vapor area (when cover is open), and exhausting less than twenty-five parts per million of solvent averaged over one complete adsorption cycle; and,
- d. be operated and maintained in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.