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Facility Name: **Findlay Industries, Inc.- Springfield Division**

Application Number: **08-3918**

Date: **September 30, 1998**

**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.

#### **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

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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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The air contaminant emissions units listed below comprise the Permit to Install for **Findlay Industries, Inc. - Springfield Division** located in **Clark** 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 &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001 (mod)	Spray Table #1	*	3745-31-05	2.00 lbs/hour, 31.72 lbs/day, 608.58 lbs/month, and 3.65 TPY organic compounds, including cleanup
			3745-21-07 (G)(2)	less stringent than OC limits above
K002 (mod)	Spray Table #2	*	3745-31-05	2.00 lbs/hour, 31.72 lbs/day, 608.58 lbs/month, and 3.65 TPY organic compounds, including cleanup
			3745-21-07 (G)(2)	less stringent than OC limits above
K003 (mod)	Spray Table #3	*	3745-31-05	2.00 lbs/hour, 31.72 lbs/day, 608.58 lbs/month, and

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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>
K003 (mod Con't)	Spray Table #3 (Con't)	*	3745-31-05 (Con't)	3.65 TPY organic compounds, including cleanup
			3745-21-07 (G)(2)	less stringent than OC limits above
K004 (mod)	Spray Table #4	*	3745-31-05	2.00 lbs/hour, 31.72 lbs/day, 608.58 lbs/month, and 3.65 TPY organic compounds, including cleanup
			3745-21-07 (G)(2)	less stringent than OC limits above
K005 (mod)	Spray Table #5	*	3745-31-05	2.00 lbs/hour, 31.72 lbs/day, 608.58 lbs/month, and 3.65 TPY organic compounds, including cleanup
			3745-21-07 (G)(2)	less stringent than OC limits above

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This modification of emissions units K001 through K005 is for an increase in the allowable VOC content as well as the adhesive usage limitations. There is also a decrease in the allowable cleanup usage. These changes result in a net increase of 7.60 TPY organic compounds over that previously permitted in PTI 08-3239 issued May 10, 1995.

\* Bat is compliance with applicable OAC rules and specified allowable emission limitations; compliance with OC content limitations of 5.18 lbs OC/gallon of adhesive and 6.44 lbs OC/gallon of cleanup; adhesive and cleanup usage limitations; recordkeeping; and reporting.

#### SUMMARY

##### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compounds	18.25

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422.**

#### 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.

#### 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.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Operational Restrictions**

1. The maximum organic compound (OC) content of the coating materials employed in each emissions unit (K001, K002, K003, K004, and K005) shall not exceed 5.18 lbs/gallon, excluding water and exempt solvents.
2. The maximum monthly coating usage for each emissions unit (K001, K002, K003, K004, and K005) shall not exceed 115 gallons.
3. The maximum OC content of the cleanup solvent employed in each emissions unit (K001, K002, K003, K004, and K005) shall not exceed 6.44 lbs/gallon, excluding water and exempt solvents.
4. The maximum monthly cleanup solvent usage for each emissions unit (K001, K002, K003, K004, and K005) shall not exceed 2 gallons.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and,

- f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. 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.

**C. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 2.00 pounds per hour, and the actual hourly organic compound emissions for each such day;
  - b. an identification of each day during which the organic compound emissions exceeded 31.72 pounds per day, and the actual organic compound emissions for each such day; and,
  - c. an identification of any exceedances of the monthly coating or cleanup usage limitations.
2. These quarterly deviation (excursion) reports shall be submitted in the following manner:
  - a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control 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

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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 preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control 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 quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**D. Testing Requirements and Compliance Determinations**

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
2.00 lbs/hour organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in B.1.
  - b. Emission Limitation -  
31.72 lbs/day organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in B.1.
  - c. Emission Limitation -  
608.58 lbs/month organic compounds, including cleanup  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as

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specified in B.1. and shall be the sum of the daily organic compound emission rates for the calendar month.

- d. Emission Limitation -  
3.68 TPY organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in B.1. and shall be the sum of the daily organic compound emission rates for the calendar year divided by 2,000 pounds per ton.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials.