


**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES**

Tommy G. Thompson, Governor  
 George E. Meyer, Secretary  
 Gloria L. McCutcheon, Regional Director

Southeast Regional Headquarters  
 2300 N. Dr. ML King Drive, Box 12436  
 Milwaukee, Wisconsin 53212-0436  
 TELEPHONE 414-263-8500  
 FAX 414-263-8716  
 TDD 414-263-8713

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

File Code: 4530  
 FID #: 241006810

John Cahill  
 Strattec Security Corporation  
 3333 W Good Hope Road  
 Glendale, WI 53209

Dear Mr. Cahill:

Your application for an air pollution control elective operation permit has been processed in accordance with s. 285.62, Wis. Stats. The enclosed elective operation permit is issued to provide authorization for your source to operate a lock lubrication operation in accordance with the requirements and conditions set forth within Parts I and II of the permit. Please read it carefully. The elective operation permit expires 5 years from the date of issuance. Application for renewal of an elective operation permit must be submitted no later than 12 months and no earlier than 18 months before the expiration date. No permittee may continue operation of a source after the operation permit expires, unless the permittee submits a timely and complete application for the renewal of the permit.

A copy of the permit should be available at the source for inspection by any authorized representative of the Department. Questions about this permit should be directed to the Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500.

#### NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes establish time periods within which requests to review Department decisions must be filed.

To request a contested case hearing pursuant to s. 285.81, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for a contested case hearing on the Secretary of the Department of Natural Resources. Any such petition for hearing shall set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired.

For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.



*Quality Natural Resources Management  
 Through Excellent Customer Service*



This notice is provided pursuant to s. 227.48(2), Wis. Stats.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

A handwritten signature in black ink, appearing to read "Eric Donaldson", with a long horizontal line extending to the right.

Eric Donaldson  
Construction Permit Team Leader  
Southeast Regional Air Program  
WDNR

cc: D. Johnston - AM/7  
Air Enforcement Branch - EPA, Region V

**BEFORE THE DEPARTMENT OF NATURAL RESOURCES  
AIR MANAGEMENT PROGRAM  
FINDINGS OF FACT  
CONCLUSIONS OF LAW  
AND DECISION**

**Findings of Fact**

The Department of Natural Resources (DNR) finds that:

- 1) Strattec Security Corporation, 3333 W Good Hope Road, Glendale, Wisconsin, has applied for an air pollution control elective operation permit. The authorized representative of the facility is John Cahill, President and Chief Operating Officer.
- 2) Strattec Security Corporation submitted an air pollution control elective operation permit application including plans and specifications and additional information on 5 September 1995, 6 September 1996, 22 October 1998 and 21 January 1999.
- 3) DNR has reviewed Strattec Security Corporation's air pollution control elective operation permit application, plans, specifications and other information available to DNR.
- 4) DNR has prepared an analysis and a Preliminary Determination on the approvability of the operation permit application.
- 5) DNR has complied with the procedures set forth in s. 285.62, Wis. Stats.
- 6) The air contaminant source meets all of the applicable criteria in ss. 285.63 and 285.64, Wis. Stats.
- 7) DNR has complied with the requirements of s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code.

**Conclusions of Law**

DNR concludes that:

- 1) DNR has authority under sec. 285.11(1), Wis. Stats., to promulgate rules contained in chs. NR 400-499, Wis. Adm. Code, including but not limited to rules containing emission limits, compliance schedules and compliance determination methods.
- 2) DNR has the authority under ss. 285.11(1), (5), and (6), 285.27(1) and (2) and 285.65, Wis. Stats., and chs. NR 400-499, Wis. Adm. Code, to establish emission limits for sources of air pollution.
- 3) DNR has the authority to issue air pollution control permits and to include conditions in such permits under ss. 285.60, 285.62, 285.63, 285.64 and 285.65, Wis. Stats.

- 4) The emission limits included in this permit are authorized by ss. 285.65, Wis. Stats., and NR 400-499, Wis. Adm. Code.
- 5) DNR is required to comply with sec. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code, in conjunction with issuing an air pollution control permit.

#### **Decision**

Strattec Security Corporation is authorized to operate a lock lubrication operation in conformity with the emission limits, monitoring, record keeping and reporting requirements and specific and general conditions set forth in this permit.

### Preamble

An Asterisk "\*" throughout this document denotes legal authority, limitations and conditions which are not federally enforceable.

#### Stack and Process Index

#### Stack S13

#### Process P13 - Lock Lubrication Operation

Permit Shield - Unless precluded by the Administrator of the USEPA, compliance with all emission limitations in this operation permit is considered to be compliance with all emission limitations established under ss. 285.01 to 285.87, Wis. Stats., and emission limitations under the federal clean air act, that are applicable to the source if the permit includes the applicable limitation or if the Department determines that the emission limitations do not apply. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source: None

Part I -- The headings for the areas in the permit are defined below. The legal authority for these limitations or methods follows them in [brackets].

Pollutant -- This area will note which pollutant is being regulated by the permit.

Limitations -- This area will list all applicable emission limitations that apply to the source, including case-by-case limitations such as Latest Available Control Techniques (LACT), Best Available Control Technology (BACT), or Lowest Achievable Emission Rate (LAER). It will also list any voluntary restrictions on hours of operation, raw material use, or production rate requested by the permittee to limit potential to emit.

Compliance Demonstration -- The compliance demonstration methods outlined in this area may be used to demonstrate compliance with the associated emission limit or work practice standard listed under the corresponding Limitations area. The compliance demonstration area contains limits on parameters or other mechanisms that will be monitored periodically to ensure compliance with the limitations. The requirement to test as well as initial and periodic test schedules, if testing is required, will be stated here.

Reference Test Methods, Recordkeeping, and Monitoring Requirements -- Specific EPA Reference test methods or other approved test methods will be contained in this area and are the methods that must be used whenever testing is required. A reference test method will be listed even if no testing is immediately required. Also included in this area are any recordkeeping requirements and their frequency and reporting requirements. Accuracy of monitoring equipment shall meet, at a minimum, the requirements of ss. NR 439.055(3) and (4), Wis. Adm. Code, as specified in Part II of this permit.

Condition Type -- This area specifies other conditions that are applicable to the entire facility that may not be tied to one specific pollutant.

Conditions -- This area lists specific conditions usually applicable to the entire facility or compliance requirements.

Compliance Demonstration -- This area contains monitoring and testing requirements and methods to demonstrate compliance with the conditions.

PART II -- This section contains the general limitations that the permittee must abide by. These requirements are standard for most sources of air pollutants so they are included in this section with every permit.

AIR POLLUTION CONTROL ELECTIVE OPERATION PERMIT

EI FACILITY NO. 241006810

PERMIT NO. 95-EJD-279-OP

STACK NO.(S). S13

SOURCE NO.(S). P13

THIS OPERATION PERMIT EXPIRES ON 12 April 2004

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Strattec Security Corporation

Street Address: 3333 W Good Hope Road  
Glendale, Wisconsin

Responsible Official & Title: John Cahill, President and Chief Operating Officer

is authorized to operate a lock lubrication operation in conformity with the conditions herein.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Milwaukee, Wisconsin this 13<sup>th</sup> day of April, 1999.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By Bill Yantawood  
Bill Yantawood, Supervisor  
Southeast Region Air Program

PART I

**A. APPLICABLE LIMITATIONS**

1. The permittee shall limit the VOC usage from the lubricant products on the lock lubrication operation (P13, S13) to less than 26.6 pounds per month averaged over any 12 consecutive month period. (sec 285.65(5), Wis. Stats.)
2. The permittee shall keep records of all lubricant materials used in the lock lubrication operation (P13, S13) indicating the VOC content (e.g. material safety data sheets (MSDS)) and the usage of each lubricant on a monthly basis, except those greases with a VOC content of less than 0.25 pounds VOC per gallon which annual records of usage will suffice for compliance demonstration. (Sec NR 407.09(1)(c)1.b. and 439.04, Wis. Adm. Code)
3. The permittee shall calculate the VOC emissions from the lubricants used in this process each month in pounds of VOC. (Sec NR 407.09(1)(c)1.b. and 439.04, Wis. Adm. Code)
4. The Department certifies a VOC emission reduction of 9 tons as a result of the conversion of solvent based lubricants to non-VOC containing lubricants and continued compliance with the provisions of this elective operation permit. Quantification and use of this emission reduction is subject to applicable state and federal requirements and to subsequent rule development by the Department.
5. If the permittee wishes to increase the VOC limit in this permit, the permittee shall go through the operation permit revision process included in ch. NR 407, Wis. Adm. Code and also retain sufficient VOC emission reduction credits in their possession in order to cover the increased VOC limit.

**B. GENERAL PERMIT CONDITIONS**

1. Whenever emission testing is required by the Department, the following test method or alternate or equivalent test method approved in writing by the Department, shall be employed:

Reference Test Method for VOC content: Whenever compliance emission testing is required, US EPA Method 24 or 24A shall be used to demonstrate compliance. [s. NR 439.06(3)(b), Wis. Adm. Code]

2. The permittee shall submit every six months the results of monitoring required by this permit to the Wisconsin Department of Natural Resources, Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500 . The submittal shall meet the requirements of s. NR 407.05(4)(i) and (j), Wis. Adm. Code and shall be submitted in the months selected by the facility as part of the operation permit application. The monitoring results shall be submitted with a certification of the truth, accuracy and completeness of the submittal signed by a responsible official (ss. NR 439.03(1)(b) and NR 439.03(10), Wis. Adm. Code).
3. The permittee shall submit to the Wisconsin Department of Natural Resources, Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500 , annual certification of the source's compliance with the operation permit in the month selected by the facility as part of the operation permit application. The certification reports shall meet the requirements of s. NR 439.03(8) through (10), Wis. Adm. Code. (s. NR 439.03(1)(c), Wis. Adm. Code).