State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/29/06

RE: Proposed Title V Chapter 3745-77 Permit
02-47-04-0852
Duffin Manufacturing Company

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for Duffin Manufacturing Company, has been created in Ohio EPA's State Air Resources System (STARS) on 12/29/06, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PIER

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 12/29/06	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 02-47-04-0852 to:
Duffin Manufacturing Company
316 Warden Ave.
P.O. Box 4036
Elyria, OH 44036

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

L001 (Vapor Degreaser #1) One (1) fully automated, enclosed, open top vapor degreaser used in cleaning parts.	L002 (Vapor Degreaser #2) One (1) fully automated, enclosed, open top vapor degreaser used in cleaning parts.	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart T

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Appendix B of 40 CFR Part 63, Subpart T: Parts 63.1(a)(1)-(3), 63.1(a)(4), 63.1(a)(6)-(8), 63.1(a)(10), 63.1(a)(12)-(14), 63.1(b)(2), 63.1(c)(1), 63.1(c)(2), 63.1(c)(4), 63.1(c)(5), 63.1(e), 63.2, 63.3(a)-(c), 63.4(a)(1)-(3), 63.4(a)(5), 63.4(b)-(c), 63.5(a)(1), 63.5(a)(2), 63.5(b)(1), 63.5(b)(4)-(6), 63.6(a), 63.6(b)(1)-(5), 63.6(c)(1)-(2), 63.6(c)(5), 63.6(e)(1)-(2), 63.6(f)-(g), 63.6(i)(1)-(14), 63.6(i)(16), 63.6(j), 63.7(a), 63.7(b), 63.7(c)(1), 63.7(e), 63.7(f), 63.7(g), 63.8(a)-(b), 63.8(f), 63.9(a)(1)-(4), 63.9(b)(1), 63.9(b)(2), 63.9(b)(3), 63.9(b)(5), 63.9(c), 63.9(d), 63.9(e), 63.9(i), 63.9(j), 63.10(a), 63.10(d)(1), 63.10(f), 63.11(a), 63.12(a)-(c), 63.13(a)-(c) and 63.15(a)-(b).

The following emissions units are subject to the aforementioned requirements: L001 and L002.

B. State Only Enforceable Section

1. The following insignificant emissions unit located at this facility is exempt from permit requirements because it is not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)), or because it meets the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - solvent distillation recycling system.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vapor Degreaser #1 (L001)

Activity Description: One (1) fully automated, enclosed, open top vapor degreaser used in cleaning parts.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
batch vapor degreaser using methylene chloride	OAC rule 3745-31-05(A)(3) (PTI No. 02-6131)	Emissions of methylene chloride shall not exceed 2.5 pounds per hour.
	40 CFR Part 63, Subpart T	See Sections A.I.2.b - A.I.2.d, A.II.1 and A.II.2.
	OAC rule 3745-21-09(O)	exempt, methylene chloride is not a VOC

2. Additional Terms and Conditions

2.a This emissions unit is a batch vapor degreaser with a solvent/air interface <1.21 square meters (13 square feet) which employs methylene chloride. The permittee has chosen to comply with control option no. 4 from Table 1, reduced room draft, freeboard ratio of 1.0 and superheated vapor.

2.b The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

i. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in section A.III.5.

(Authority for term: 40 CFR Part 63.463(e)(2)(ii)(A))

ii. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in section A.III.5.

(Authority for term: 40 CFR Part 63.463(e)(2)(ii)(B))

iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts basket at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(Authority for term: 40 CFR Part 63.463(a)(3))

2. Additional Terms and Conditions (continued)

iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

(Authority for term: 40 CFR Part 63.463(a)(4))

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

(Authority for term: 40 CFR Part 63.463(a)(5))

vi. The solvent cleaning machine shall have a primary condenser.

(Authority for term: 40 CFR Part 63.463(a)(6))

2.c The permittee shall comply with the following requirements:

i. Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point. The boiling point for methylene chloride is 104.2°F.

ii. Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system are followed.

iii. Ensure that the parts remain within the superheated vapor for at least the minimum proper dwell time.

(Authority for term: 40 CFR Part 63.463(e)(2)(vi))

2.d The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

(Authority for term: 40 CFR Part 63.463(b)(1) Table 1, Option #4)

II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:

a. Control air disturbances across the solvent cleaning machine opening(s) by employing a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in section A.III.5. The permitteee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in section A.III.5.

b. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

II. Operational Restrictions (continued)

d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Director (Ohio EPA, Northeast District Office).

e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

i. The solvent cleaning machine and its associated controls shall be maintained as recommeded by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (Ohio EPA, Northeast District Office) to achieve the same or better results as those recommeded by the manufacturer.

j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of 40 CFR Part 63, Subpart T if requested during an inspection by the Director (Ohio EPA, Northeast District Office).

k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

l. Sponges, fabric, wood, and paper products shall not be cleaned.

(Authority for term: 40 CFR Part 63.463(d) and OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described below:

a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

b. The permittee shall conduct monthly* monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

d. If the permittee can demonstrate to the satisfaction of the Director (Ohio EPA, Northeast District Office) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

*During the compliance inspection dates of 5/17 and 7/14, 2005, the permittee demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the hoist speed is less than 11 feet per minute. Therefore, the required monitoring frequency is quarterly.

(Authority for term: 40 CFR Part 63.466(c) and OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.

b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

(Authority for term: 40 CFR Part 63.467(a) and OAC rule 3745-77-07(C)(1))

3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

a. The results of control device monitoring required in this section of the permit.

b. Information on the actions taken to comply with sections A.I.2.b.i, A.I.2.b.ii and A.I.2.c, including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

c. Estimates of the methylene chloride annual consumption for the solvent cleaning machine.

(Authority for term: 40 CFR Part 63.467(b) and OAC rule 3745-77-07(C)(1))

4. The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in idling mode.

(Authority for term: 40 CFR Part 63.466(a)(2) and OAC 3745-77-07(C)(1))

5. The permittee shall conduct monthly monitoring tests of the wind speed within the enclosure using the procedures outlined in (a) and (b). below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.

a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.

b. Record the maximum wind speed.

(Authority for term: 40 CFR Part 63.466(d)(2) and OAC 3745-77-07(C)(1))

6. The permittee shall collect and record the following information each week for this emissions unit:

a. The name of each degreasing solvent utilized.

b. The number of gallons (Ls) and density (D), in pounds per gallon, of each degreasing solvent utilized.

c. The number of gallons of each degreasing solvent sent off site as waste (Lw).

d. The number of hours of operation per week (T).

e. The average hourly methylene chloride emission rate E(lbs/hr), calculated by the following equation:

$E = (Ls-Lw) \times D/T$.

(Authority for term: OAC rule 3745-31-05(A)(3) and PTI No. 02-6131)

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 63.463 (d)(10)".

b. An estimate of solvent consumption during the reporting period.

(Authority for term: 40 CFR Part 63.468(f) and OAC rule 3745-77-07(C)(1))

2. The permittee shall submit an exceedance report on a semiannual basis.

If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office).

If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point, and correction was not made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office).

(Authority for term: 40 CFR Part 63.463(e)(4), 40 CFR Part 63.468(h) and OAC rule 3745-77-07(C)(1))

3. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) the emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Ohio EPA, Northeast District Office) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. The reason and a description of the exceedance and action(s) taken to comply with sections A.I.2.b.i, A.I.2.b.ii and A.I.2.c including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

b. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(Authority for term: 40 CFR Part 63.468(h)(1-3) and (i)(1-3) and OAC rule 3745-77-07(C)(1))

4. The permittee shall submit quarterly deviation (excursion) reports that include the an identification of each weekly record showing the hourly methylene chloride emission rate exceeded 2.5 pounds per hour, and the actual average hourly methylene chloride emissions for each such hour.

(Authority for term: OAC rule 3745-31-05(A)(3) and PTI No. 02-6131)

V. Testing Requirements

1.a The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

Determine the potential to emit for each individual solvent cleaning machine and for all solvent cleaning machines at the facility using the following equation:

PTEi = Hi X Wi X SAIi
Where:

PTEi = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

Hi = the potential hours of operation for solvent cleaning machine i (hours per year), which is 8760 hours per year.

Wi = the working mode uncontrolled emission rate, which is 1.95 kilograms per square meter per hour.

SAIi = the solvent/air interface area of solvent cleaning machine i (square meters). The solvent/air interface is the surface area of the solvent vapor zone that is exposed to the air.

Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

(Authority for term: 40 CFR Part 63.461, 40 CFR Part 63.465(e)(1) and 40 CFR Part 63.465(e)(3))

2. Compliance with the emission limitation of 2.5 pounds per hour of methylene chloride shall be based on the record keeping specified in Section A.III.6.

(Authority for term: OAC rule 3745-31-05(A)(3))

3. If any of the requirements of sections A.I.2.b.i, A.I.2.b.ii and A.I.2.care not met, determine whether an exceedance has occurred using the following criteria:

i . An exceedance has occurred if the requirements of Sections A.I.2.b.ii, A.I.2.c.ii or A.I.2.c.iii specified above have not been met.

ii. An exceedance has occurred if the requirements of Sections A.I.2.b.i or A.I.2.c.i specified above have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

(Authority for term: 40 CFR Part 63.463(e)(3))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vapor Degreaser #2 (L002)

Activity Description: One (1) fully automated, enclosed, open top vapor degreaser used in cleaning parts.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
batch vapor degreaser using methylene chloride	OAC rule 3745-31-05(A)(3) (PTI No. 02-6131)	Emissions of methylene chloride shall not exceed 2.5 pounds per hour.
	40 CFR Part 63, Subpart T	See Sections A.I.2.b - A.I.2.d, A.II.1 and A.II.2.
	OAC rule 3745-21-09(O)	exempt, methylene chloride is not a VOC

2. Additional Terms and Conditions

2.a This emissions unit is a batch vapor degreaser with a solvent/air interface <1.21 square meters (13 square feet) which employs methylene chloride. The permittee has chosen to comply with control option no. 4 from Table 1, reduced room draft, freeboard ratio of 1.0 and superheated vapor.

2.b The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

i. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in section A.III.5.

(Authority for term: 40 CFR Part 63.463(e)(2)(ii)(A))

ii. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in section A.III.5.

(Authority for term: 40 CFR Part 63.463(e)(2)(ii)(B))

iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts basket at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(Authority for term: 40 CFR Part 63.463(a)(3))

2. Additional Terms and Conditions (continued)

iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

(Authority for term: 40 CFR Part 63.463(a)(4))

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

(Authority for term: 40 CFR Part 63.463(a)(5))

vi. The solvent cleaning machine shall have a primary condenser.

(Authority for term: 40 CFR Part 63.463(a)(6))

2.c The permittee shall comply with the following requirements:

i. Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point. The boiling point for methylene chloride is 104.2°F.

ii. Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system are followed.

iii. Ensure that the parts remain within the superheated vapor for at least the minimum proper dwell time.

(Authority for term: 40 CFR Part 63.463(e)(2)(vi))

2.d The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

(Authority for term: 40 CFR Part 63.463(b)(1) Table 1, Option #4)

II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:

a. Control air disturbances across the solvent cleaning machine opening(s) by employing a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in section A.III.5. The permitteee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in section A.III.5.

b. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

II. Operational Restrictions (continued)

d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Director (Ohio EPA, Northeast District Office).

e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

i. The solvent cleaning machine and its associated controls shall be maintained as recommeded by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (Ohio EPA, Northeast District Office) to achieve the same or better results as those recommeded by the manufacturer.

j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of 40 CFR Part 63, Subpart T if requested during an inspection by the Director (Ohio EPA, Northeast District Office).

k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

l. Sponges, fabric, wood, and paper products shall not be cleaned.

(Authority for term: 40 CFR Part 63.463(d) and OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described below:

a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

b. The permittee shall conduct monthly* monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

d. If the permittee can demonstrate to the satisfaction of the Director (Ohio EPA, Northeast District Office) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

*During the compliance inspection dates of 5/17 and 7/14, 2005, the permittee demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the hoist speed is less than 11 feet per minute. Therefore, the required monitoring frequency is quarterly.

(Authority for term: 40 CFR Part 63.466(c) and OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.

b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

(Authority for term: 40 CFR Part 63.467(a) and OAC rule 3745-77-07(C)(1))

3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

a. The results of control device monitoring required in this section of the permit.

b. Information on the actions taken to comply with sections A.I.2.b.i, A.I.2.b.ii and A.I.2.c, including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

c. Estimates of the methylene chloride annual consumption for the solvent cleaning machine.

(Authority for term: 40 CFR Part 63.467(b) and OAC rule 3745-77-07(C)(1))

4. The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in idling mode.

(Authority for term: 40 CFR Part 63.466(a)(2) and OAC 3745-77-07(C)(1))

5. The permittee shall conduct monthly monitoring tests of the wind speed within the enclosure using the procedures outlined in (a) and (b). below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.

a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.

b. Record the maximum wind speed.

(Authority for term: 40 CFR Part 63.466(d)(2) and OAC 3745-77-07(C)(1))

6. The permittee shall collect and record the following information each week for this emissions unit:

a. The name of each degreasing solvent utilized.

b. The number of gallons (Ls) and density (D), in pounds per gallon, of each degreasing solvent utilized.

c. The number of gallons of each degreasing solvent sent off site as waste (Lw).

d. The number of hours of operation per week (T).

e. The average hourly methylene chloride emission rate E(lbs/hr), calculated by the following equation:

$E = (Ls-Lw) \times D/T$.

(Authority for term: OAC rule 3745-31-05(A)(3) and PTI No. 02-6131)

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 63.463 (d)(10)".

b. An estimate of solvent consumption during the reporting period.

(Authority for term: 40 CFR Part 63.468(f) and OAC rule 3745-77-07(C)(1))

2. The permittee shall submit an exceedance report on a semiannual basis.

If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office).

If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point, and correction was not made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office).

(Authority for term: 40 CFR Part 63.463(e)(4), 40 CFR Part 63.468(h) and OAC rule 3745-77-07(C)(1))

3. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) the emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Ohio EPA, Northeast District Office) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. The reason and a description of the exceedance and action(s) taken to comply with sections A.I.2.b.i, A.I.2.b.ii and A.I.2.c including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

b. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(Authority for term: 40 CFR Part 63.468(h)(1-3) and (i)(1-3) and OAC rule 3745-77-07(C)(1))

4. The permittee shall submit quarterly deviation (excursion) reports that include the an identification of each weekly record showing the hourly methylene chloride emission rate exceeded 2.5 pounds per hour, and the actual average hourly methylene chloride emissions for each such hour.

(Authority for term: OAC rule 3745-31-05(A)(3) and PTI No. 02-6131)

V. Testing Requirements

1.a The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

Determine the potential to emit for each individual solvent cleaning machine and for all solvent cleaning machines at the facility using the following equation:

PTEi = Hi X Wi X SAIi
Where:

PTEi = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

Hi = the potential hours of operation for solvent cleaning machine i (hours per year), which is 8760 hours per year.

Wi = the working mode uncontrolled emission rate, which is 1.95 kilograms per square meter per hour.

SAIi = the solvent/air interface area of solvent cleaning machine i (square meters). The solvent/air interface is the surface area of the solvent vapor zone that is exposed to the air.

Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

(Authority for term: 40 CFR Part 63.461, 40 CFR Part 63.465(e)(1) and 40 CFR Part 63.465(e)(3))

2. Compliance with the emission limitation of 2.5 pounds per hour of methylene chloride shall be based on the record keeping specified in Section A.III.6.

(Authority for term: OAC rule 3745-31-05(A)(3))

3. If any of the requirements of sections A.I.2.b.i, A.I.2.b.ii and A.I.2.care not met, determine whether an exceedance has occurred using the following criteria:

i . An exceedance has occurred if the requirements of Sections A.I.2.b.ii, A.I.2.c.ii or A.I.2.c.iii specified above have not been met.

ii. An exceedance has occurred if the requirements of Sections A.I.2.b.i or A.I.2.c.i specified above have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

(Authority for term: 40 CFR Part 63.463(e)(3))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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