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

04/13/05

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

16-77-01-0540
Thermo-Rite MFG. Co.
Keith E Kleive
1355 Evans Ave
Akron, OH 44305

Dear Keith E Kleive:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Akron Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Akron Air Pollution Control.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronically submitted)
File, DAPC PMU
Akron Air Pollution Control
Pennsylvania
West Virginia

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 04/13/05	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: 16-77-01-0540 to:

Thermo-Rite MFG. Co.
1355 Evans Ave.
Akron, OH 44305

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

K001 (Recip. Paint Line) Ransburg Reciprocating Paint Line with shared Baking Oven K002 (Paint Booth)	Paint Booth with shared Baking Oven L001 (Paint Line Degreaser) Baron-Blakeslee Paint Line Degreaser	L002 (Batch Degreaser) Detrex Batch Vapor Degreaser

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:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

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 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.

In accordance with OAC rule 3745-15-06, a malfunction 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides 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 the requirements (in part) 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:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the 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 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.

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 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))

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.

(Authority for term: OAC rule 3745-77-07(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 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. 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

Each insignificant activity 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

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 quarterly, i.e., 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 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;

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; and

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. Thermo-Rite MFG. Co. has requested to restrict the coating usage for the affected source (K001 and K002), as defined in section 63.3882 of 40 CFR Part 63, Subpart MMMM, to 249 gallons per rolling, 12-month period. Thermo-Rite MFG. Co. proposed this operational limit to avoid being subject to the National Emission Standards for Harzardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subpart MMMM.

*Non-HAP coating means, for the purposes of 40 CFR Part 63, Subpart MMMM, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The maximum annual coating usage for emissions units K001 and K002 shall not exceed 249 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the effective date of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

. Month(s)	Maximum Allowable Cumulative Coating Usage
1	21
1-2	42
1-3	62
1-4	83
1-5	104
1-6	125
1-7	145
1-8	166
1-9	187
1-10	208
1-11	228
1-12	249

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rule 3745-77-07(A)(1)]

3. The permittee shall maintain monthly records of the following information for emissions units K001 and K002, combined:

a. the coating usage for each month; and

b. beginning after the first 12 calendar months of operation following the effective date of this permit, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the effective date of this permit, the permittee shall record the cumulative coating usage for each calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

A. State and Federally Enforceable Section (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels specified in Part II, section A.2. The quarterly reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.ii of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The following insignificant emissions units are located at this facility:

Z001 - buffing operation;
Z002 - sawing operation; and
Z003 - radiant heaters.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Recip. Paint Line (K001)

Activity Description: Ransburg Reciprocating Paint Line with shared Baking Oven

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
Ransburg reciprocating paint line with shared baking oven - coating of miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 16-123)	The best available technology determination for PTI 16-123 was determined to be compliance with all applicable State and federal rules The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-17-07(A)	The visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-09(U)(2)(e)(ii)	See sections A.I.2.a and A.II.1 below.
	40 CFR Part 63, Subpart MMMM	Thermo-Rite MFG. Co. has requested to limit the coating usage for the affected source, as defined in section 63.3882 of 40 CFR Part 63, Subpart MMMM, to 249 gallons per rolling, 12-month period to avoid being subject to this federal regulation. See Part II - Specific Facility Terms and Conditions A.1 through A.4.

2. Additional Terms and Conditions

2.a Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally approved SIP (for the Cleveland/Akron ozone area). The rule has been revised by the Ohio EPA to specify an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation from the USEPA of the acceptability of the lower exemption level; therefore, the 3 gallons per day usage restriction in section A.II.1 below will serve as the exemption level while SIP approval by USEPA is being obtained.

II. Operational Restrictions

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

[Authority for term: OAC rule 3745-21-09(B)(3)(d) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit as specified in section A.II.1 above. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(B)(3)(e) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

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: Paint Booth (K002)

Activity Description: Paint Booth with shared Baking Oven

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
paint booth with shared baking oven - coating of miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 16-1956)	19.3 lbs/day of volatile organic compounds (VOC) for coatings 3.9 tpy of VOC for coatings and cleanup materials 2.4 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-17-07(A)	The visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-09(U)(2)(e)(ii)	See sections A.I.2.a and A.II.1 below.
	40 CFR Part 63, Subpart MMMM	Thermo-Rite MFG. Co. has requested to limit the coating usage for the affected source, as defined in section 63.3882 of 40 CFR Part 63, Subpart MMMM, to 249 gallons per rolling, 12-month period to avoid being subject to this federal regulation. See Part II - Specific Facility Terms and Conditions A.1 through A.4.

2. Additional Terms and Conditions

2.a Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally approved SIP (for the Cleveland/Akron ozone area). The rule has been revised by the Ohio EPA to specify an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation from the USEPA of the acceptability of the lower exemption level; therefore, the 3 gallons per day usage restriction in section A.II.1 below will serve as the exemption level while SIP approval by USEPA is being obtained.

II. Operational Restrictions

1. The permittee shall employ no more than 3.0 gallons of coating in any one day in this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(d) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed;

c. the VOC content of each coating, in pounds per gallon, as applied; and

d. the total VOC emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for the coating line:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon; and

d. the total VOC emissions from all cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit as specified in A.II.1 above. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(e) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions exceeded 19.3 pounds per day, and the actual daily VOC emissions for each such day.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-03(B)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

where:

E = particulate emissions rate (pounds per hour);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:

2.4 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation:

19.3 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. USEPA Method 24 or 24A shall be used to determine the VOC content for each coating.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emission Limitation:

3.9 tpy of VOC for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3. Formulation data shall be used to determine the VOC content of each cleanup material. US EPA Method 24 or 24A shall be used to determine the VOC content for each coating.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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
paint booth with shared baking oven - coating of miscellaneous metal parts	none	See B.III.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 19.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3275

MAGLC (ug/m3): 4476.19

Pollutant: VM&P naphtha

TLV (mg/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 19.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3275

MAGLC (ug/m3): 32619.05

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

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line Degreaser (L001)

Activity Description: Baron-Blakeslee Paint Line Degreaser

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
Baron-Blakeslee paint line degreaser	OAC rule 3745-31-05(A)(3) (PTI 16-123)	The best available technology determination for PTI 16-123 was determined to be compliance with all applicable State and federal rules The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(O)(6)(b) and 40 CFR Part 63, Subparts A and T.
	OAC rule 3745-21-09(O)(6)(b)	Paragraphs (O)(2) to (O)(5) of OAC rule 3745-21-09 shall not apply to any solvent metal cleaning operation which is subject to Subpart T of 40 CFR Part 63, provided the requirements of Subpart T are specified in the terms and conditions of the permit to operate issued pursuant to rule 3745-35-02 of the Administrative Code, a permit to install issued pursuant to rule 3745-31-05 of the Administrative Code, or a Title V permit issued pursuant to rule 3745-77-08 of the Administrative Code. See section A.I.2.a below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart T	The owner or operator shall ensure that the emissions from the solvent cleaning machine are equal to or less than 153 kilograms/square meter/month (31.3 pounds/square foot/month) as a 3-month, rolling average as determined using the procedures in sections A.V.1 and A.V.2 of these terms and conditions. [Authority for term: section 63.464(a)(1)(ii) of 40 CFR Part 63, Subpart T]
	40 CFR Part 63, Subpart A	See 40 CFR Part 63, Subpart T, Appendix B (Attachment 1) for the requirements of 40 CFR Part 63, Subpart A that are applicable to this emissions unit.

2. Additional Terms and Conditions

2.a Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5), the exemption allowed in accordance with OAC rule 3745-21-09(O)(6)(b) is not part of the federally approved SIP. The rule has been revised by the Ohio EPA to specify that a solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5), provided the requirements of Subpart T are specified in the terms and conditions of the Title V permit. The Ohio EPA has received confirmation from the USEPA of the acceptability of the exemption; therefore, the requirements of OAC rule 3745-21-09(O) will not be cited in the Title V permit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The owner or operator shall maintain a log of solvent additions and deletions for the solvent cleaning machine.

[Authority for term: section 63.464(a)(i) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

2. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of section 63.464 of 40 CFR Part 63, Subpart T shall maintain records specified in paragraphs 2.a through 2.c of this section either in electronic or written form for a period of 5 years.

a. the dates and amounts of solvent that are added to the solvent cleaning machine;

b. the solvent composition of wastes removed from cleaning machines as determined using the procedure described in section A.V.2.b of these terms and conditions; and

c. calculation sheets showing how monthly emissions and the rolling, 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations.

[Authority for term: section 63.467(c) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of section 63.464 of 40 CFR Part 63, Subpart T shall submit a solvent emission report every year by February 1. This solvent emission report shall contain the requirements specified in paragraphs 1.a through 1.c of this section.

a. the size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity);

b. the average monthly solvent consumption for the solvent cleaning machine in kilograms per month or pounds per month; and

c. the 3-month monthly, rolling average solvent emission estimates calculated each month using the method as described in section A.V.2 of these terms and conditions.

[Authority for term: section 63.468(g) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an exceedance report to the Akron RAQMD semiannually except when the Akron RAQMD determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or an exceedance occurs. Once an exceedance has occurred the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under section A.IV.3 of these terms and conditions is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs 2.a through 2.b of this section.

a. if an exceedance has occurred, the reason for the exceedance and a description of the actions taken; and

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: section 63.468(h) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

3. A permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs 3.a through 3.c of this section are met.

a. the source has demonstrated a full year of compliance without an exceedance;

b. the permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR Part 63, Subpart T; and

c. the Akron RAQMD does not object to a reduced frequency of reporting for the affected source as provided in paragraph 63.10(e)(3)(iii) of 40 CFR Part 63, Subpart A (General Provisions).

[Authority for term: section 63.468(i) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464 of 40 CFR Part 63, Subpart T shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in section A.V.2 of these terms and conditions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

[Authority for term: section 63.465(b) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464 of 40 CFR Part 63, Subpart T shall, on the first operating day of the month, comply with the requirements specified in paragraphs 2.a through 2.c of this section.

a. Using the records of all solvent additions and deletions for the previous monthly reporting period required under section A.III.1 of these terms and conditions, determine solvent emissions (Ei) using equation 2 for cleaning machines with a solvent/air interface:

Ei = (SAi - LSRi - SSRi)/(AREAi) equation (2)

where:

Ei = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month);

SAi = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month);

LSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month);

SSRi = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in paragraph 2.b of this section, during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month); and

AREAi = the solvent/air interface area of the solvent cleaning machine (square meters or square feet).

b. Determine SSRi using the method specified in paragraph 2.b.i or 2.b.ii of this section.

i. From tests conducted using EPA reference method 25d.

ii. By engineering calculations included in the compliance report.

c. Determine the monthly, rolling average, EA, for the 3-month period ending with the most recent reporting period using equation 4 for cleaning machines with a solvent/air interface:

EAi = (the summation of (Ei) from j = 1 to j = 3) / 3 equation 4

where:

EAi = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month);

Ei = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area or pounds of solvent per square foot of solvent/air interface area);

j = 1 = the most recent monthly reporting period;

j = 2 = the monthly reporting period immediately prior to j = 1; and

j = 3 = the monthly reporting period immediately prior to j = 2.

[Authority for term: section 63.465(c) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

3. An owner or operator of a source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs 3.a through 3.c of this section. A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility.

a. Determine the potential to emit for each individual solvent cleaning using equation 6.

PTEi = Hi x Wi x SAIi equation 6

where:

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

Hi = hours of operation for solvent cleaning machine i (hours per year);

= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement;

Wi = the working mode uncontrolled emission rate (kilograms per square meter per hour);

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines;

= 1.12 kilograms per square meter per hour for in-line cleaning machines; and

SAIi = solvent/air interface area of solvent cleaning machine i (square meters).

Section 63.461 of 40 CFR Part 63, Subpart T defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in paragraph 3.b of this section.

b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using equation 7.

SAI = 2.20 x (Vol)^ 0.6 equation 7

where:

SAI = the solvent/air interface area (square meters); and

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

c. 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: section 63.465(e) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

4. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

V. Testing Requirements (continued)

4.a Emission Limitation:

The owner or operator shall ensure that the emissions from the solvent cleaning machine are equal to or less than 153 kilograms/square meter/month (31.3 pounds/square foot/month) as a 3-month, rolling average.

Applicable Compliance Method:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464(a) of 40 CFR Part 63, Subpart T shall demonstrate compliance with the applicable 3-month, rolling average monthly emission limitation on a monthly basis as described in sections A.V.1 and A.V.2 of these terms and conditions.

If the applicable 3-month, rolling average emission limitation is not met, an exceedance has occurred. All exceedances shall be reported as required in section A.IV.2 of these terms and conditions.

[Authority for term: sections 63.464(b) and (c) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

1. 40 CFR Part 63, Subpart T can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce 40 CFR Part 63, Subpart T. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of 40 CFR Part 63, Subpart T is delegated to a State, local, or Tribal agency.

[Authority for term: section 63.470(a) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

2. In delegating implementation and enforcement authority of 40 CFR Part 63, Subpart T to a State, local, or Tribal agency under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.3 of these terms and conditions are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

[Authority for term: section 63.470(b) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

3. The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs 3.a through 3.d below.

a. Approval of alternatives to the requirements in sections 63.460, 63.462(a) through (d), and 63.463 through 63.464 (except for the authorities in section 63.463(d)(9)) of 40 CFR Part 63, Subpart T. Use the procedures in section 63.469 of 40 CFR Part 63, Subpart T to request the use of alternative equipment or procedures.

b. Approval of major alternatives to test methods under sections 63.7(e)(2)(ii) and (f) of 40 CFR Part 63, Subpart A, as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

c. Approval of major alternatives to monitoring under section 63.8(f) of 40 CFR Part 63, Subpart A, as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

d. Approval of major alternatives to record keeping and reporting under section 63.10(f), as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

[Authority for term: section 63.470(c) of 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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: Batch Degreaser (L002)

Activity Description: Detrex Batch Vapor Degreaser

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
Detrex Model No. VS-800 open-top vapor degreaser - batch vapor degreaser	OAC rule 3745-31-05(A)(3) (PTI 16-02355)	0.3 ton of organic compounds (OC) per month and 3.6 tons of OC per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(6)(b) and 40 CFR Part 63, Subparts A and T.
	OAC rule 3745-21-09(O)(6)(b)	Paragraphs (O)(2) to (O)(5) of OAC rule 3745-21-09 shall not apply to any solvent metal cleaning operation which is subject to Subpart T of 40 CFR Part 63, provided the requirements of Subpart T are specified in the terms and conditions of the permit to operate issued pursuant to rule 3745-35-02 of the Administrative Code, a permit to install issued pursuant to rule 3745-31-05 of the Administrative Code, or a Title V permit issued pursuant to rule 3745-77-08 of the Administrative Code. See section A.I.2.a below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart T	The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine are equal to or less than 150 kilograms/square meter/month (30.7 pounds/square foot/month) as a 3-month, rolling average. [Authority for term: section 63.464(a)(1)(ii) of 40 CFR Part 63, Subpart T]
	40 CFR Part 63, Subpart A	See 40 CFR Part 63, Subpart T, Appendix B (Attachment 1) for the requirements of 40 CFR Part 63, Subpart A that are applicable to this emissions unit.

2. Additional Terms and Conditions

2.a Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5), the exemption allowed in accordance with OAC rule 3745-21-09(O)(6)(b) is not part of the federally approved SIP. The rule has been revised by the Ohio EPA to specify that a solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5), provided the requirements of Subpart T are specified in the terms and conditions of the Title V permit. The Ohio EPA has received confirmation from the USEPA of the acceptability of the exemption; therefore, the requirements of OAC rule 3745-21-09(O) will not be cited in the Title V permit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.

[Authority for term: section 63.464(a)(1)(i) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall demonstrate compliance with the 3-month, rolling average monthly emission limitation of less than or equal to 150 kilograms/square meter/month (30.7 pounds/square foot/month) on a monthly basis as follows:

a. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

b. The permittee shall on the first operating day of the month comply with the following:

i. Using the records of solvent additions and removals for the previous monthly reporting period, determine trichloroethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit.

ii. Determine the total amount of trichloroethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms or pounds of solvent per month) as specified in the "Testing Requirements" section of this permit.

iii. Determine the monthly rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in the "Testing Requirements" section of this permit.

[Authority for term: sections 63.465(b) & (c) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

a. the dates and amounts of trichloroethylene that are added to the solvent cleaning machine;

b. the trichloroethylene composition of wastes removed from the cleaning machines as determined using the procedures described in paragraph A.V.1.b.ii of this permit; and

c. calculation sheets showing how the monthly emissions and the rolling, 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.

[Authority for term: section 63.467(c) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall maintain the following monthly records for this emissions unit:

a. the name and identification of each solvent employed;

b. the total number of gallons of each solvent added to the solvent cleaning machine; and

c. the total monthly OC emission rate, in tons per month (i.e., [the sum (4.b) times (solvent density) for each solvent, then divided by 2000 pounds per ton].

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit an annual solvent emission report by February 1 of each year. The report shall cover the previous calendar year. The report shall contain the following:

a. the size (solvent/air interface area) and type of the solvent cleaning machine;

b. the average monthly trichloroethylene consumption for the solvent cleaning machine in kilograms or pounds per month; and

c. the 3-month monthly rolling average trichloroethylene emissions estimates calculated each month using the method as described in section A.V.1.b of this permit.

[Authority for term: section 63.468(g) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an exceedance report to the Akron RAQMD semiannually except when the Akron RAQMD determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or an exceedance occurs. Once an exceedance has occurred, the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under section A.IV.3 of these terms and conditions is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs 2.a through 2.b of this section.

a. if an exceedance has occurred, the reason for the exceedance and a description of the actions taken to comply with the 3-month, rolling average for trichloroethylene; and

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: section 63.468(h) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. A permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs 3.a through 3.c of this section are met.

a. the source has demonstrated a full year of compliance without an exceedance;

b. the permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR Part 63, Subpart T; and

c. the Akron RAQMD does not object to a reduced frequency of reporting for the affected source as provided in paragraph 63.10(e)(3)(iii) of 40 CFR Part 63, Subpart A (General Provisions).

[Authority for term: section 63.468(i) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the OC emissions exceeded 0.3 ton per month, and the actual monthly OC emissions for each such month.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464 of 40 CFR Part 63, Subpart T shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in section A.V.2 of these terms and conditions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

[Authority for term: section 63.465(b) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464 of 40 CFR Part 63, Subpart T shall, on the first operating day of the month, comply with the requirements specified in paragraphs 2.a through 2.c of this section.

a. Using the records of all solvent additions and deletions for the previous monthly reporting period required under section A.III.1 of these terms and conditions, determine solvent emissions (Ei) using equation 2 for cleaning machines with a solvent/air interface:

$$Ei = (SAi - LSRi - SSRi)/(AREAi) \qquad \text{equation (2)}$$

where:

Ei = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month);

SAi = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month);

LSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month);

SSRi = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in paragraph 2.b of this section, during the most recent monthly reporting period i, (kilograms of solvent per month or pounds of solvent per month); and

AREAi = the solvent/air interface area of the solvent cleaning machine (square meters or square feet).

b. Determine SSRi using the method specified in paragraph 2.b.i or 2.b.ii of this section.

i. From tests conducted using EPA reference method 25d.

ii. By engineering calculations included in the compliance report.

V. Testing Requirements (continued)

c. Determine the monthly, rolling average, EA, for the 3-month period ending with the most recent reporting period using equation 4 for cleaning machines with a solvent/air interface:

EAi = (the summation of (Ei) from j = 1 to j = 3) / 3 equation 4

where:

EAi = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month);

Ei = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area or pounds of solvent per square foot of solvent/air interface area);

j = 1 = the most recent monthly reporting period;

j = 2 = the monthly reporting period immediately prior to j = 1; and

j = 3 = the monthly reporting period immediately prior to j = 2.

[Authority for term: section 63.465(c) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. An owner or operator of a source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs 3.a through 3.c of this section. A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility.

a. Determine the potential to emit for each individual solvent cleaning using equation 6.

PTEi = Hi x Wi x SAIi equation 6

where:

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

Hi = hours of operation for solvent cleaning machine i (hours per year);

= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement;

Wi = the working mode uncontrolled emission rate (kilograms per square meter per hour);

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines;

= 1.12 kilograms per square meter per hour for in-line cleaning machines; and

SAIi = solvent/air interface area of solvent cleaning machine i (square meters).

Section 63.461 of 40 CFR Part 63, Subpart T defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in paragraph 3.b of this section.

V. Testing Requirements (continued)

b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using equation 7.

SAI = 2.20 x (Vol)^ 0.6 equation 7

where:

SAI = the solvent/air interface area (square meters); and

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

c. 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: section 63.465(e) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

4.a Emission Limitations:

0.3 ton of OC per month and 3.6 tons of OC per year

Applicable Compliance Method:

Compliance with the emission limitations shall be determined through the monthly record keeping of the solvent usage and OC emission rate calculations as specified in section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4.b Emission Limitation:

The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine are equal to or less than 150 kilograms/square meter/month (30.7 pounds/square foot/month) as a 3-month, rolling average.

Applicable Compliance Method:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with section 63.464(a) of 40 CFR Part 63, Subpart T shall demonstrate compliance with the applicable 3-month, rolling average monthly emission limitation on a monthly basis as described in sections A.V.1 and A.V.2 of these terms and conditions.

If the applicable 3-month, rolling average emission limitation is not met, an exceedance has occurred. All exceedances shall be reported as required in section A.IV.2 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

1. 40 CFR Part 63, Subpart T can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce 40 CFR Part 63, Subpart T. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of 40 CFR Part 63, Subpart T is delegated to a State, local, or Tribal agency.

[Authority for term: section 63.470(a) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements (continued)

2. In delegating implementation and enforcement authority of 40 CFR Part 63, Subpart T to a State, local, or Tribal agency under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.3 of these terms and conditions are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

[Authority for term: section 63.470(b) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs 3.a through 3.d below.

a. Approval of alternatives to the requirements in sections 63.460, 63.462(a) through (d), and 63.463 through 63.464 (except for the authorities in section 63.463(d)(9)) of 40 CFR Part 63, Subpart T. Use the procedures in section 63.469 of 40 CFR Part 63, Subpart T to request the use of alternative equipment or procedures.

b. Approval of major alternatives to test methods under sections 63.7(e)(2)(ii) and (f) of 40 CFR Part 63, Subpart A, as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

c. Approval of major alternatives to monitoring under section 63.8(f) of 40 CFR Part 63, Subpart A, as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

d. Approval of major alternatives to record keeping and reporting under section 63.10(f), as defined in section 63.90 of 40 CFR Part 63, Subpart E, and as required in 40 CFR Part 63, Subpart T.

[Authority for term: section 63.470(c) of 40 CFR Part 63, Subpart T, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

****

THIS IS THE LAST PAGE OF THE PERMIT

****

Attachment 1

Appendix B to Subpart T of Part 63 -- General Provisions Applicability to Subpart T

Reference	Applies to subpart T		Comments
	BCC	BVI	
63.1(a) (1)-(3)	Yes	Yes	
63.1(a)(4)	Yes	Yes	Subpart T (this appendix) specifies applicability of each paragraph in subpart A to subpart T.
63.1(a)(5)	No	No	
63.1(a) (6)-(8)	Yes	Yes	
63.1(a)(9)	No	No	
63.1(a)(10)	Yes	Yes	
63.1(a)(11)	No	No	Subpart T allows submittal of notifications and reports through the U.S. mail, fax, and courier. Subpart T requires that the postmark for notifications and reports submitted through the U.S. mail or other non-Governmental mail carriers be on or before deadline specified in an applicable requirement.
63.1(a) (12)-(14)	Yes	Yes	
63.1(b)(1)	No	No	Subpart T specifies applicability.
63.1(b)(2)	No	Yes	
63.1(b)(3)	No	No	Subpart T requires that a record of halogenated cleaning machine applicability determination be kept on site for 5 years, or until the cleaning machine changes its operations. The record shall be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to subpart T.
63.1(c)(1)	Yes	Yes	
63.1(c)(2)	Yes	Yes	Subpart T, § 63.46(8)(h), indicates a Title V permit exemption for halogenated HAP batch cold solvent cleaning machines that are not major sources and not located at a major source. This section also specifies a deferral from the requirement of a Title V permit for owners or operators of solvent cleaning machines subject to subpart T provisions, other than halogenated HAP batch cold solvent cleaning machines, that are not major sources, and not located at a major source.
63.1(c)(3)	No	No	
63.1(c)(4)	Yes	Yes	
63.1(c)(5)	Yes	Yes	Subpart T does not require continuous monitoring systems (CMS) or continuous opacity monitoring systems. Therefore, notifications and requirements for CMS and COMS specified in subpart A do not apply to subpart T.
63.1(d)	No	No	
63.1(e)	No	Yes	
63.2	Yes	Yes	Subpart T definitions (§ 63.461) for existing and new overlap with the definitions for existing source and new source in subpart A (§ 63.2). Both subpart A and T also define Administrator.
63.3(a)-(c)	Yes	Yes	
63.4(a) (1)-(3)	Yes	Yes	
63.4(a)(4)	No	No	
63.4(a)(5)	Yes	Yes	
63.4(b)-(c)	Yes	Yes	
63.5(a)(1)	Yes	Yes	
63.5(a)(2)	Yes	Yes	
63.5(b)(1)	Yes	Yes	
63.5(b)(2)	No	No	
63.5(b)(3)	No	No	Subpart T overrides the requirement for approval prior to constructing a new or reconstructing an existing major source.
63.5(b)(4)-(6)	Yes	Yes	
63.5(c)	No	No	
63.5 (d)-(f)	No	No	Subpart T overrides the requirement to submit an application for approval of construction or reconstruction of a halogenated solvent cleaning machine.
63.6(a)	Yes	Yes	
63.6(b) (1)-(5)	Yes	Yes	Subpart T, § 63.460, specifies compliance dates.
63.6(b)(6)	No	No	
63.6(b)(7)	No	No	Subpart T has the same requirements for affected halogenated HAP solvent cleaning machine subcategories that are located at area sources as it does for those located at major sources.
63.6(c)(1)-(2)	Yes	Yes	Subpart T allows 3 years from the date of

			promulgation for both area and major existing sources to comply.
63.6(c) (3)-(4)	No	No	
63.6(c)(5)	Yes	Yes	Subpart T has the same requirements for affected halogenated HAP solvent cleaning machine subcategories that are located at area sources as it does for those located at major sources. Subpart T allows 3 years from the date of promulgation for both area and major existing sources to comply.
63.6(d)	No	No	
63.6(e)(1)-(2)	Yes	Yes	
63.6(e)(3)	No	No	Subpart T overrides the requirement of a startup, shutdown, and malfunction plan. Subpart T specifies startup and shutdown procedures to be followed by an owner or operator for batch vapor and in-line cleaning machines.
63.6(f)-(g)	Yes	Yes	
63.6(h)	No	No	Subpart T does not require compliance with an opacity or visible emission standard.
63.6(i) (1)-(14)	Yes	Yes	
63.6(i)(15)	No	No	
63.6(i)(16)	Yes	Yes	
63.6(j)	Yes	Yes	
63.7(a)	No	Yes	Subpart T gives owners or operators the option to perform an idling emission performance test as a way of demonstrating compliance. Other options are also available that do not require a performance test.
63.7(b)	No	Yes	This is only required for those owners or operators that choose the idling emission standard as their compliance option.
63.7(c)(1)	No	Yes	This is only required for those owners or operators that choose the idling emission standard as their compliance option.
63.7(c) (2)-(3)	No	No	Subpart T does not require a site-specific test plan for the idling emission performance test.
63.7(c)(4)	No	No	Subpart T does not require a performance test that involves the retrieval of gas samples, and therefore this does not apply.
63.7(d)	No	No	Requirements do not apply to the idling emission performance test option.
63.7(e)	No	Yes	
63.7(f)	No	Yes	
63.7(g)	No	Yes	Subpart T specifies what is required to demonstrate idling emission standard compliance through the use of the Environmental Protection Agency test method 307 and control device monitoring. Reports and records of testing and monitoring are required for compliance verification. Three runs of the test are required for compliance, as specified in § 63.7(e) of subpart A.
63.7(h)	No	No	Subpart T does not require the use of a performance test to comply with the standard. The idling emission standard option (which requires an idling emission performance test) is an alternative option offered to owners or operators of batch vapor and in-line cleaning machines for compliance flexibility.
63.8 (a)-(b)	Yes	Yes	
63.8 (c)-(e)	No	No	Subpart T does not require the use of continuous monitoring systems to demonstrate compliance.
63.8(f)	Yes	Yes	
63.8(g)	No	No	Subpart T does not require continuous opacity monitoring systems and continuous monitoring systems data.
63.9(a) (1)-(4)	Yes	Yes	
63.9(b)(1)	Yes	Yes	
63.9(b)(2)	Yes	Yes	Subpart T includes all of those requirements stated in subpart A, except that subpart A also requires a statement as to whether the affected source is a major or an area source, and an identification of the relevant standard (including the source's compliance date). Subpart T also has some more specific information requirements specific to the affected source (see subpart T, §§ 63.468(a)-(b)).
63.9(b)(3)	Yes	Yes	The subpart A and subpart T initial notification reports differ (see above).
63.9(b)(4)	No	No	Subpart T does not require an application for approval of construction or reconstruction.
63.9(b)(5)	Yes	Yes	
63.9(c)	Yes	Yes	

63.9(d)	Yes	Yes	
63.9(e)	Yes	Yes	Under subpart T, this requirement only applies to owners or operators choosing to comply with the idling emissions standard.
63.9(f)	No	No	Subpart T does not require opacity or visible emission observations.
63.9(g)(1)	No	No	Subpart T does not require the use of continuous monitoring systems or continuous opacity monitoring systems.
63.9(h)	No	No	Section 63.468 of subpart T requires an initial statement of compliance for existing sources to be submitted to the Administrator no later than 150 days after the compliance date specified in § 63.460(d) of subpart T. For new sources, this report is to be submitted to the Administrator no later than 150 days from the date specified in § 63.460(c).
63.9(i)	Yes	Yes	
63.9(j)	Yes	Yes	
63.10(a)	Yes	Yes	
63.10(b)	No	No	Recordkeeping requirements are specified in subpart T.
63.10(c) (1)-(15)	No	No	Subpart T does not require continuous monitoring systems.
63.10(d)(1)	Yes	Yes	
63.10(d)(2)	No	No	Reporting requirements are specified in subpart T.
63.10(e) (l)-(2)	No	No	Subpart T does not require continuous emissions monitoring systems.
63.10(e)(3)	No	No	Subpart T does not require continuous monitoring systems.
63.10(e)(4)	No	No	Subpart T does not require continuous opacity monitoring systems.
63.10(f)	Yes	Yes	
63.11(a)	Yes	Yes	
63.11(b)	No	No	Flares are not a control option under subpart T.
63.12 (a)-(c)	Yes	Yes	
63.13 (a)-(c)	Yes	Yes	
63.14	No	No	Subpart T requirements do not require the use of the test methods incorporated by reference in subpart A.
63.15(a)-(b)	Yes	Yes	

BCC=Batch Cold Cleaning Machines.
BVI=Batch Vapor and In-line Cleaning Machines.

[59 FR 61818, Dec. 2, 1994; 60 FR 29485, June 5, 1995]

Statement of Basis For Title V Permit

Part I - General	
Company Name	**Thermo-Rite Mfg. Co.**
Premise Number	**1677010540**
What makes this facility a Title V facility?	**Individual HAP**
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	**Yes**
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	**No**
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	**The applicable general terms and conditions of 40 CFR Part 63, Subpart A in relation to 40 CFR Part 63, Subpart T were identified in Appendix 1. A coating usage limitation for emissions units K001 and K002 was added to the Part II - Specific Facility Terms and Conditions to avoid being subject to 40 CFR Part 63, Subpart MMMM. PTI 16-02355 increased the monthly and annual OC emissions for emissions unit L002. Authority citations were added.**

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1 through A.13	N	Y	Other - 40 CFR Part 63, subpart A. These terms and conditions are the applicable parts of 40 CFR Part 63, subpart A as specified by 40 CFR Part 63, subpart T.
A.14	77-07(A)(1)	N	Statement of request by the facility to limit the coating usage to 249 gallons per rolling 12-month period to avoid applicability of 40 CFR Part 63, subpart MMMM.
A.15	77-07(A)(1)	N	The coating usage restriction (rolling 12-month restriction and cumulative).
A.16	77-07(A)(3)(a)	N	Record keeping for the coating usage restriction.
A.17	77-07(A)(3)(c)	N	Reporting for deviations of coating usage restriction.
A.18	77-07(A)(13)	N	List of insignificant emissions units.

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State and Federally Enforceable Section)																
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.																
EU(s)	Limitation	Basis		ND	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													

K001 and K002	20% opacity as a 6-minute average	17-07	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Compliance with this emission limitation can be determined using Method 9.
K001 and K002	0.551 lb/hr of particulate emissions	17-11	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Compliance is demonstrated through use a calculation using worst-case coating solids and maximum coating usage.
K001 and K002	3 gallons of coating per day or less	21-09(U)(2)(e)(ii)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance with limit determined through usage records.
K001 and K002	249 gallons per rolling, 12-month period for the affect source	N	Y	Y	Y	Y	N	N	Y	N	Y	N	N	N	Other - 40 CFR Part 63, subpart MMMM OR - Facility is limiting the coating usage to 249 gallons per 12-month period to avoid applicability to 40 CFR Part 63, subpart MMMM. ET - Compliance is determined through usage records.
K002	19.3 pounds of VOC per day for coatings	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05 ET - Compliance is determined through daily record keeping of the coating usage and VOC content.
K002	3.9 tons of VOC per year for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05 ET - Compliance is determined through daily record keeping of the coating usage and VOC content and monthly record keeping of the cleanup material usage and VOC content.
K002	2.4 tons of PE per year	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - Compliance is demonstrated through use a calculation using worst-case coating solids and maximum coating usage to determine a maximum hourly rate then multiplied by 8760 hour per year and divided by 2000 pounds per ton.

L001	153 kilograms/ square meter/ month as a rolling 12-month summatio n	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - 40 CFR Part 63, subpart T ET - Compliance is determined through usage records (additions and deletion to the degreaser).
L002	150 kilograms/ square meter/ month as a rolling 12-month summatio n	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - 40 CFR Part 63, subpart T ET - Compliance is determined through usage records (additions and deletion to the degreaser).
L002	0.3 ton of OC per month	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is determined through monthly usage records and solvent density of the solvent.
L002	3.6 tons of OC per year	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is determined through monthly usage records and solvent density of the solvent.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

- If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not <u>all</u> of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

  Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

  1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
  2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
  3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
  2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

  An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.