



State of Ohio Environmental Protection Agency

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11/14/2008

Mike Javaras  
Meyer Products LLC  
18513 Euclid Avenue  
Cleveland, OH 44112-1084

Certified Mail

Facility ID: 1318001982  
Permit Number: P0094387  
County: Cuyahoga

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 9/8/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
Columbus, Ohio 43215

and Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Cleveland Division of Air Quality





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

## **PRELIMINARY PROPOSED**

### **Air Pollution Title V Permit for Meyer Products LLC**

Facility ID: 1318001982  
Permit Number: P0094387  
Permit Type: Renewal  
Issued: 11/14/2008  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Title V Permit**  
 for  
 Meyer Products LLC

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Preliminary Proposed Title V Permit**

**Permit Number:** P0094387

**Facility ID:** 1318001982

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1318001982

Facility Description: Snowplow equipment manufacturer.

Application Number(s): A0025889, A0025890, A0025891, A0025892, A0025893, A0025894

Permit Number: P0094387

Permit Description: Meyer Products LLC Title V Renewal

Permit Type: Renewal

Issue Date: 11/14/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Meyer Products LLC  
18513 Euclid Avenue  
Cleveland, OH 44112-1084

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Preliminary Proposed Title V Permit**

**Permit Number:** P0094387

**Facility ID:** 1318001982

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations  
*(Authority for term: ORC 3704.036(A))*

**2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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:
  - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

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

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

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

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

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

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



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

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

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) 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 Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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))*

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Cleveland Division of Air Quality.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. 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 Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **4. 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))*

### **5. 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))*



**6. 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))*

**7. 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 Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee



shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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))*

**9. 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))*

**10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. 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))*

## **12. 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))*

## **13. 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:
  - (1) 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.
  - (2) 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.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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:

- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
- (2) 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.

(3) 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))*

#### **14. 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))*

#### **15. 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))*

## **16. 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))*

## **17. Off-Permit Changes**

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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



## 18. 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.)*

## 19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

## 20. 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))*

## 21. 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))*

## 22. Permanent Shutdown of an Emissions Unit

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

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

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

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



### 23. Title VI Provisions

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

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.  
*(Authority for term: OAC rule 3745-77-01(H)(11))*

### 24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 25. Records Retention Requirements Under State Law Only

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.

### 26. 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.

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

**27. 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).

**28. 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.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Preliminary Proposed Title V Permit**

**Permit Number:** P0094387

**Facility ID:** 1318001982

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) 4. and 5.
2. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart T

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Appendix C of 40 CFR Part 63, Subpart T:

- 63.1(a)(1)-(3);
- 63.1(a)(4);
- 63.1(a)(6)-(8);
- 63.1(a)(10);
- 63.1(a)(12)-(14);
- 63.1(b)(2);
- 63.1(c)(1);
- 63.1(c)(2);
- 63.1(c)(4);
- 63.1(c)(5);
- 63.1(e);
- 63.2;
- 63.3(a)-(c);
- 63.4(a)(1)-(3);
- 63.4(a)(5);
- 63.4(b)-(c);
- 63.5(a)(1);
- 63.5(a)(2);
- 63.5(b)(1);
- 63.5(b)(4)-(6);
- 63.6(a);
- 63.6(b)(1)-(5);
- 63.6(c)(1)-(2);
- 63.6(c)(5);
- 63.6(e)(1)-(2);
- 63.6(f)-(g);
- 63.6(i)(1)-(14);
- 63.6(i)(16);
- 63.6(j);
- 63.7(a);
- 63.7(b);
- 63.7(c)(1);
- 63.7(e);
- 63.7(f);
- 63.7(g);
- 63.8(a)-(b);
- 63.8(f);
- 63.9(a)(1)-(4);
- 63.9(b)(1);
- 63.9(b)(2);
- 63.9(b)(3);



- 63.9(b)(5);
- 63.9(c);
- 63.9(d);
- 63.9(e);
- 63.9(i);
- 63.9(j);
- 63.10(a);
- 63.10(d)(1);
- 63.10(f);
- 63.11(a);
- 63.12(a)-(c);
- 63.13(a)-(c); and
- 63.15(a)-(b).

The following emissions unit is subject to the aforementioned requirements: L001.

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

- P002: 23 MIG Welding Stations and Filter Collection System-A - OAC rule 3745-31-03(A)(1)(ii)
- P003: 23 MIG Welding Stations and Filter Collection System-B - OAC rule 3745-31-03(A)(1)(ii)
- Z007: Wheelabrator Tumbler - OAC rule 3745-31-03(A)(1)(y)
- Z008: Space Heaters - OAC rule 3745-31-03(A)(1)(a)
- Z009: MIG Weld Station C (12 manual MIG weld stations) - OAC rule 3745-31-03(A)(1)(ii)
- Z010: MIG Weld Stations D (10 robotic MIG weld stations) - OAC rule 3745-31-03(A)(1)(ii)

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that 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.

4. The following insignificant emissions units are located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

- P007 Whitney Plasma Torch and Turret Punch
- Z002 Electrostatic Powder Coating Line

5. The following emissions units at this facility have been shut down: P001 (Shot Blast Booth), P004 (Plasma-Burner), P005 (Plasma-Burner HD), K002 (Dip Tank Coating Line), K003 (Binks Spray Booth), Z001 (Prime Paint Booth), Z003 (Finish Paint Booth) and Z005 (High Temperature Alkaline Wash and Iron Phosphate Pre-Treat).



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## **C. Emissions Unit Terms and Conditions**



**1. L001, TCE Batch Conveyorized Vapor Degreaser**

**Operations, Property and/or Equipment Description:**

TCE Batch Conveyorized Vapor Degreaser - Cleans hydraulic lifts just prior to painting

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit-to-Install #13-03379 issued 6/24/1998)	VOC (trichloroethylene) emissions shall not exceed 1.86 lbs/hour and 8.14 tons/year
b.	OAC rule 3745-21-09(O)(6)(b)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5).
c.	40 CFR Part 63, Subpart T	See b)(2)a. through b)(2)c. below.

(2) Additional Terms and Conditions

a. The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ a freeboard refrigeration device and maintain a freeboard ratio of 1.0 as the chosen control combination selected from Table 1 of Subpart T [40 CFR 63.463(b)].

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

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

i. The permittee shall use an idling and downtime mode cover, that shall be in place during the idling mode and during the downtime mode, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

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



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

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

- (1) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance, as described in the "Monitoring and Record keeping Requirements" section of this permit; and these parameters shall meet the requirements established in this permit.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall ensure that the chilled air blanket temperature, measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall ensure that the cover is in place whenever parts are not in the solvent cleaning machine and it completely covers the cleaning machine openings during downtime and during the idling mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements is/are being conducted. The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (4) The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (5) The permittee shall control air disturbances across the solvent cleaning machine by using an idling and downtime mode cover, that shall be in place during the idling and downtime modes, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed. The cover shall be able to be readily opened or closed, shall completely cover the cleaning machine openings when in place, and shall be free of cracks, holes and other defects.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (6) The permittee shall meet the following required work and operational practices:

- a. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
- b. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.



- c. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- d. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using alternative maintenance practices that have been demonstrated to the satisfaction of the Cleveland Division of Air Quality (Cleveland DAQ) to achieve the same or better results as those recommended by the manufacturer.
- e. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
- f. Sponges, fabric, wood, paper products and/or other porous or absorbent material shall not be cleaned.
- g. The solvent cleaning machine's automated parts handling system shall move the parts or parts basket at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed).

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (7) The permittee shall meet all of the following required work and operational practices:
  - a. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
  - b. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Cleveland DAQ.
  - c. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the above operational requirements are as stringent as or more stringent than the operational requirements contained in Permit to Install No. 13-03379 issued on 6/24/1998. The operational requirements contained in the above-referenced Permit to Install are subsumed into the operational requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying operational requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:



- a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
- b. records of the halogenated HAP trichloroethylene solvent content for each solvent used in the solvent cleaning machine; and
- c. the date of installation for the solvent cleaning machine and all of its control devices.

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

- (2) Using a thermometer or thermocouple, the permittee shall measure and record, on a weekly basis, the temperature at the center of the air blanket during the idling mode.

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

- (3) The permittee shall conduct a monthly visual inspection of the idling-mode/downtime cover(s) and shall maintain a record of the results. The records shall document that the cover is opening and closing properly, that it completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.

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

- (4) The permittee shall measure and record the freeboard ratio before each solvent addition to assure compliance with the control requirement limitation.

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

- (5) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:

- a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils; and
- b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
- c. the primary condenser.

- (6) Included in the record shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

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

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install No. 13-03379 issued on 6/24/1998. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.



[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit an annual report to the Cleveland DAQ by February 1 of each year, following the year for which the report is being made. This report shall contain the following information:
  - a. a signed statement, by the facility owner or his designee, stating that "all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by 40 CFR Part 63 Subpart T; and
  - b. an estimate of solvent consumption during the reporting period and emissions of each HAP.

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

- (2) The permittee shall submit an exceedance report to the Cleveland DAQ on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the Cleveland DAQ of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:
  - a. the emissions unit has demonstrated a full year of compliance without an exceedance;
  - b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and
  - c. the Cleveland DAQ does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions.

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

- (3) The permittee shall submit a deviation report to the Cleveland DAQ if the temperature of the chilled air blanket, measured at its center, was greater than 30% of the solvent's boiling point and was not adjusted within 15 days of detection.

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

- (4) The permittee shall submit a deviation report to the Cleveland DAQ if the cover did not completely cover the cleaning machine openings, when containing the HAP solvent and during any idling or downtime mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements were being conducted. Cracks, holes or other defects to the cover, that were not repaired or the cover not replaced within 15 days of detection, shall also be reported.

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



- (5) The permittee shall submit a deviation report to the Cleveland DAQ if the freeboard ratio is not maintained at 1.0 or greater.

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

- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

If any of the following control equipment is not repaired or replaced within 15 days of any malfunction, and/or the machine is not shut down until repaired:

- a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils; and
- b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
- c. the primary condenser.

Included in the report shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: 40 CFR Part 63, Subpart T, OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)] and OAC rule 3745-77-07(C)(1)]

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 13-03379, issued on 6/24/1998. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
1.86 lbs VOC (trichloroethylene) per hour and 8.14 tons VOC (trichloroethylene) per year

Applicable Compliance Method:

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



- i. determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SA_i$$

where:

PTE<sub>i</sub> = the potential to emit for the solvent cleaning machine i (kilograms solvent per year)

$$TPY \text{ limit} = PTE_i \times 0.0011023$$

H<sub>i</sub> = hours of operation for solvent cleaning machine i (hours per year)  
= 8,760 hours per year, unless otherwise restricted by a federally enforceable requirement

W<sub>i</sub> = the working mode uncontrolled emission rate (kilograms per square meter per hour) = 1.12 kilograms per square meter per hour for in-line solvent cleaning machines

SA<sub>i</sub> = solvent/air interface area of solvent cleaning machine i (square meters).

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

- (2) Emissions Limitation/Control Requirements:  
The permittee has selected or has installed and shall employ a freeboard refrigeration device and maintain a freeboard ratio of 1.0, as the control combination required from Table 1, found in 40 CFR 63.463.

Applicable Compliance Method:  
The permittee shall demonstrate compliance with the selected control combination, a freeboard refrigeration device and maintain a freeboard ratio of 1.0, through compliance with the "Additional Terms and Conditions", "Operational Restrictions", and "Monitoring and Recordkeeping Requirements" and "Testing Requirement" sections of this permit.

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

- (3) Emissions Limitation/Control Requirements:  
The chilled air blanket temperature measured at the center of the air blanket shall be no greater than 30% of the solvent's boiling point.

Applicable Compliance Method:  
The solvent's boiling point shall be documented and, on a weekly basis, the permittee shall measure the temperature at the center of the air blanket during the idling mode using a thermometer or thermocouple.

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

- (4) Emissions Limitation/Control Requirements:  
The freeboard ratio shall not exceed 1.0.



**Applicable Compliance Method:**

The permittee shall measure and record the freeboard ratio before and after each solvent addition to assure compliance with the control requirement limitation.

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

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install No. 13-03379, issued on 6/24/1998. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in December of 1997.
- (2) The terms and conditions for this emissions unit have been changed from what was established in PTI No. 13-03379. The reason for the change is because the PTI provided different control options due to uncertainty at the time of installation. These modified terms reflect the control option chosen by the permittee for MACT Subpart T.



**2. P006, Wheelabrator Tumbler on Powder Coat Line**

**Operations, Property and/or Equipment Description:**

Remove particle matter from parts prior to powder coating equipped with a fabric filter/baghouse which is vented inside the building

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit-to-Install #13-04252 issued 7/1/2004)	No visible particulate emissions (PE) from the baghouse stack serving this emissions unit.  PE from the emissions unit fabric filter/baghouse shall not exceed 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.  PE shall not exceed 0.62 pound per hour and 2.72 tons per year.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record, for the control system, the downtime of the capture (collection) system, control device, and monitoring equipment and corrective actions for each day the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
No visible particulate emissions (PE) from the baghouse stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible PE observations performed in accordance with USEPA Test Method 22 of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]



- b. **Emission Limitation:**  
PE from the emissions unit fabric filter/baghouse shall not exceed 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases and shall not exceed 0.62 pound per hour.

**Applicable Compliance Method:**

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): Test Methods 1 through 4 of 40 CFR Part 60, Appendix A for gas flow characteristics and Test Method 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10) for PE.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]

- c. **Emission Limitation:**  
PE shall not exceed 2.72 tons per year.

**Applicable Compliance Method:**

The ton per year limitation was developed by multiplying the hourly particulate emission rate by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/hr limitation.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04252]

- g) **Miscellaneous Requirements**

- (1) None.



**3. P008, Laser Cutter**

**Operations, Property and/or Equipment Description:**

Cut metal sheeting using a Masak laser cutter with Torit dust collector

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit-to-Install #13-04636 issued 7/6/2006)	Particulate emissions (PE) shall not exceed 0.81 lb/hr and 3.56 TPY.  Visible PE from any stack shall not exceed 5% opacity, as a 6 minute average.
b.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The short-term and annual PE limitations are based on the emissions unit's potential to emit. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.

c) Operational Restrictions

(1) The pressure drop across the dust collector shall be maintained within the range of 4 to 6 inches of water while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04636]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The permittee shall record the pressure drop across the dust collector daily.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04636]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

All periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)] and OAC rule 3745-77-07(C)(1); PTI No. 13-04636]

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
PE shall not exceed 0.81 lb/hr.

Applicable Compliance Method:  
Compliance with the emission limitation shall be determined by using the following one-time calculation for potential to emit:

$$\text{Lbs/hr} = (\text{gr/scfm})(1 \text{ lb}/7000 \text{ gr})(\text{dscfm}/\text{min})(60 \text{ min}/\text{hr}) = (0.02 \text{ gr}/\text{scfm})(1 \text{ lb}/7000 \text{ gr})(4732 \text{ dscf}/\text{min})(60 \text{ min}/\text{hr}) = 0.81 \text{ lb}/\text{hr}$$

$$\text{DSCFM} = (\text{ACFM})[(460 \text{ R} + 70)/(460 \text{ R} + \text{T})] (\text{Actual P}/14.7)(1-\text{Bwo})$$

$$\text{DSCFM} = (5000 \text{ acfm})(460+70/460+100)(14.7/14.7)(1-0) = 4732 \text{ dscf}/\text{min}$$

Where:

ACFM is the actual cubic feet per minute;

DSCFM is the dry cubic feet per minute at standard conditions;

gr is grains (7000 grains per pound);

Actual P is the pressure in psi;



R is the temperature in degrees Rankine;

T is the temperature in degrees Fahrenheit; and

Bwo is the volumetric fraction of water vapor

If required by the Ohio EPA or Cleveland Division of Air Quality, compliance with the allowable PE limitation shall be determined in accordance with U.S. EPA Reference Methods 1 through 5 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04636]

- b. Emission Limitation:  
PE shall not exceed 3.56 TPY

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by the following calculation:

$$(0.81 \text{ lb PE/hr})(8760 \text{ hrs/yr})(1 \text{ Ton}/2000 \text{ lbs}) = 3.56 \text{ TPY PE}$$

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04636]

- c. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 5% percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1); PTI No. 13-04636]

- g) Miscellaneous Requirements

- (1) None.



**4. K004, Paint Spray Booth for Hydraulic Lifts**

**Operations, Property and/or Equipment Description:**

Spray booth for coating hydraulic lifts

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(c)	VOC content of extreme performance coatings shall be limited to 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
b.	OAC rule 3745-17-11(C)	Exempt, pursuant to OAC rule 3745-17-11(A)(1)(i).

(2) Additional Terms and Conditions

a. Only extreme performance coatings shall be employed in this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the mass of VOC per volume of each coating (i.e., VOC content in lbs/gal), excluding water and exempt solvents, as applied.

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

e) Reporting Requirements

(1) The permittee shall notify the Cleveland DAQ in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record



and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.

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

f) Testing Requirements

- (1) USEPA Method 24 shall be used to determine the VOC contents for coatings. The permittee must either conduct a Method 24 analysis of the coating or obtain a Method 24 analysis of the coating from the coating supplier. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-21-04(B)(5)]

g) Miscellaneous Requirements

- (1) None.