



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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

03/30/01

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

02-47-04-0179  
Invacare Corporation  
Glenn E Holm  
1200 Taylor Street  
Elyria, OH 44035-2125

Dear Glenn E Holm:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 08/28/97. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA 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. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

and

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

Also, 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 fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Northeast District Office  
Becky Castle, DAPC PMU



## Ohio EPA

State of Ohio Environmental Protection Agency

### PRELIMINARY PROPOSED TITLE V PERMIT

Date: 03/30/01

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

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

This document constitutes issuance to:

Invacare Corporation  
1200 Taylor Street  
Elyria, OH 44035-2125

of a Title V permit for Facility ID: 02-47-04-0179

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

L001 (Large Degreaser)

Vapor Degrease Material Prior To Brazing

P001 (Decorative Chrome Plating Line)

Cleaning Line Stacks/North And South Chrome Scrubber Stacks

R001 (Coating Booth)

Spray booth to apply waterproof coating

R002 (Coating Booth)

Spray booth to apply waterproof coating

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 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.8 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- 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 are true, accurate, and complete.

## **2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

## **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.

## **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.

## **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. 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.

## **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.

## **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.

## **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.

## **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 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.

## **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.

## **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 appropriate Ohio EPA District Office or local air agency 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.

### **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.

### **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).

## **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.

## **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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

**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.

**18. Insignificant Activity**

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

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

### **1. 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.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. 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.

### **4. 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.

**5. 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).

**6. 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.

**7. 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.

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

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.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

**None**

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

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

P002-Nitric acid strip line/burnishing line  
P003-Chrome evaporator  
P004-Nickel evaporator  
P005-Wastewater treatment  
B011-Boiler #1  
B012-Boiler #2

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 the emissions unit.

2. The facility is hereby notified that this permit and all Agency records covering the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Large Degreaser (L001)  
**Activity Description:** Vapor Degrease Material Prior To Brazing

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Open top vapor degreaser using perchloroethylene	40 CFR Part 63 Subpart T	See A.I.2.a, A.I.2.b, A.I.2.c, and A.I.2.d below.
	OAC rule 3745-21-09(O)	In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit. See A.I.2.e below.
	OAC rule 3745-31-05(A)(3) PTI No. 02-3288	OC emissions shall not exceed 99.0 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O).  The requirements established pursuant to this rule are less stringent than the requirements of 40 CFR Part 63, Subpart T.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit or Celsius), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- 2.b The permittee shall comply with the following requirements:
  - i. ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point;
  - ii. ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed; and
  - iii. ensure that parts remain within the superheated vapor for at least a minimum proper dwell time.

## **2. Additional Terms and Conditions (continued)**

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

- i. ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed; and
- ii. ensure that the working-mode cover is maintained free of cracks, holes, and other defects.

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

- i. Use of an idling and downtime mode cover that shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when is place, and must be free of cracks, holes, and other defects.
- ii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
- iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- vi. The solvent cleaning machine shall have a primary condenser.

**2.e** This rule citation reflects the new exemption added to OAC rule 3745-21-09 (O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for ozone.

## **II. Operational Restrictions**

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

- a. control air disturbances across the solvent cleaning machine opening(s) by ensuring that the cover(s) to the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place;
- b. the parts basket or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less;
- c. any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
- d. parts shall be orientated 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 Ohio EPA, NEDO);

## II. Operational Restrictions (continued)

- e. parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped;
- f. during startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;
- g. during shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
- h. when solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
- i. the solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA NEDO to achieve the same or better results as those recommended by the manufacturer;
- j. the permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR part 63, Appendix B if requested during an inspection by the Ohio EPA NEDO;
- k. waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container; and
- l. sponges, fabric, wood, and paper products shall not be cleaned in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year of monitoring no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
  - d. If the permittee can demonstrate to the satisfaction of the Ohio EPA NEDO in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including the first year of compliance.
2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
  - b. the date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted; and
  - c. records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

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

3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
  - a. the results of control device monitoring required in this section of the permit;
  - b. information on the actions taken to comply with 40 CFR 63.463(e) and (f), including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels;
  - c. estimates of annual perchloroethylene consumption for the solvent cleaning machine; and
  - d. estimates of annual perchloroethylene waste removed from the solvent cleaning machine.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
5. The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated vapor zone while the solvent cleaning machine is in the idling mode.
6. The permittee shall conduct monitoring and record the results on a monthly basis for the working mode cover by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
7. The permittee shall maintain an annual record which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).

### IV. Reporting Requirements

1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of Subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
  - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
  - c. The report shall include an estimate of the perchloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), Subpart A.
2. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
  - a. a signed statement from the facility owner or the owner's designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR Part 60.463(d)(10)"; and
  - b. an estimate of solvent consumption during the reporting period.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit an exceedance report on a semiannual basis. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
  - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.
4. The permittee shall submit an exceedance report on a semiannual basis. If the cover, when closed, did not completely cover the cleaning machine openings or the cover was open at times other than for parts entrance or removal and/or the cover had cracks, holes, or other defects and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
  - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.

#### IV. Reporting Requirements (continued)

5. The permittee shall submit an exceedance report on a semiannual basis. If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
  - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.
6. The permittee shall submit an annual report which summarizes the annual total organic compound emissions as calculated according to the testing requirements of this permit. This report shall be submitted to the Ohio EPA, Northeast District Office by February 15 of each year and shall cover the operations of this emissions unit for the previous calendar year.

#### V. Testing Requirements

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

Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year)

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = 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.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

**V. Testing Requirements (continued)**

2. Compliance with the emission limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

OC emissions shall not exceed 99.0 tons per year.

Applicable Compliance Method:

To determine the actual organic compound emission rate, the following equation shall be used:

$$E = (L_s - L_w) \times D / 2000$$

E = organic compound emissions rate (tons/year)

L<sub>s</sub> = liquid volume of cleaning solvent employed each year (gallons)

L<sub>w</sub> = liquid volume of cleaning solvent sent off-site as waste (gallons)

D = density of cleaning solvent (pounds/gallon)

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual organic compound emissions rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Decorative Chrome Plating Line (P001)  
**Activity Description:** Cleaning Line Stacks/North And South Chrome Scrubber Stacks

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Decorative chromium plating line: acid cleaning tanks, alkaline cleaning tanks, nickel plating tanks, chromium plating tanks	40 CFR Part 63 Subpart N	See A.2.a below.
	OAC rule 3745-17-07(A)(1)	Visible particulate matter emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.

##### 2. Additional Terms and Conditions

- The permittee shall control chromium emissions discharged to the atmosphere by not allowing the surface tension of the electroplating bath to exceed 45 dynes per centimeter (3.1 x 10E-03 pound-force per foot) at any time during operation of the tank.

##### II. Operational Restrictions

- At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.
- Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Ohio EPA Northeast District Office, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the Ohio EPA Northeast District Office may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
4. The permittee shall maintain an operation and maintenance plan. The plan shall include the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected emissions unit, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - b. If a stalagmometer is used for monitoring, follow the manufacturer's recommendations.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.
  - f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Ohio EPA Northeast District Office.
  - g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for a period of five years after each revision to the plan.
  - h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

### III. Monitoring and/or Record Keeping Requirements

1.
  - a. During an initial performance test, which was required to be completed by July 23, 1996, the permittee shall determine the outlet chromium concentration using the procedures described in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a wetting agent-type or combination wetting agent-type/foam blanket fume suppressant. The permittee shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B of 40 CFR Part 63, Subpart N, setting the maximum value that corresponds to compliance with the applicable emission limitations. In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. If this test has not been completed, the permittee shall complete the test within 30 days after the issuance of this permit.
  - b. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected emissions unit at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the permittee is using this value as the maximum surface tension value, shall constitute noncompliance with the standards.
  - c. The surface tension shall be monitored according to the following schedule:
    - i. The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Subpart N.
    - ii. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed is once every 40 hours of tank operation.
    - iii. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed. A subsequent decrease in frequency shall follow the schedule in paragraph (ii) above.
    - iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in paragraph (ii) above.
2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.

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

3. The permittee also shall maintain the following records:
  - a. inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
  - b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;
  - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
  - d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - e. other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
  - f. test reports documenting results of all performance tests;
  - g. all measurements as may be necessary to determine the conditions of performance tests;
  - h. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;
  - i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;
  - j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
  - k. the total process operating time of the emissions unit during the reporting period;
  - l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 63.9 and 63.10 of 40 CFR Part 63, Subpart A; and
  - m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.
4. All records shall be maintained for a period of five years.

### **IV. Reporting Requirements**

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 Subpart A. These reports shall be made to the Ohio EPA Northeast District Office and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the Ohio EPA District Office on or before the specified date.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit a summary report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Ohio EPA Northeast District Office to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. the company name and address of the emissions unit;
  - b. an identification of the operating parameter that is monitored for compliance determination;
  - c. the relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that corresponds to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section;
  - d. the beginning and ending dates of the reporting period;
  - e. the total operating time of the emissions unit during the reporting period;
  - f. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
  - g. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
  - h. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
  - i. a description of any changes in monitoring, processes, or controls since the last reporting period;
  - j. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and
  - k. the date of the report.
3. The permittee shall submit semiannual reports if the following conditions are met:
  - a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. the total duration of malfunctions of the add-on air pollution control device monitoring equipment is 5 percent or greater of the total operating time.
4. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.
5. The Ohio EPA Northeast District Office may determine on a case- by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.

#### IV. Reporting Requirements (continued)

6. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site if all of the following conditions are met:
  - a. For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 Subpart A and this permit.
  - c. The Ohio EPA Northeast District Office does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met :
    - i. The permittee notifies the Ohio EPA Northeast District Office in writing of its intentions to make such a change. The Ohio EPA Northeast District Office may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the Ohio EPA Northeast District Office will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
    - ii. If monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
7. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the Ohio EPA Northeast District Office which includes the following:
  - a. the permittee's name, title, and address;
  - b. the address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's;
  - c. a notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR Part 63.2;
  - d. an identification of 40 CFR Part 63, Subpart N as the basis for the notification;
  - e. the expected commencement and completion dates of the construction or reconstruction;
  - f. the anticipated date of (initial) startup;
  - g. the type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing);
  - h. a description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used; and
  - i. an estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

#### **IV. Reporting Requirements (continued)**

8. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Ohio EPA Northeast District Office:
  - a. A brief description of the affected emissions unit and the components to be replaced.
  - b. A brief description of the present and proposed emission control technique.
  - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
  - d. The estimated life of the affected emissions unit after the replacements.
  - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the Ohio EPA Northeast District Office's satisfaction that the technical or economic limitations affected the emissions unit's ability to comply with the relevant standard and how they do so.

#### **V. Testing Requirements**

1. Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities", shall be used to measure the surface tension of electroplating and anodizing baths.
2. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. The surface tension of electroplating and anodizing baths shall be measured using Method 306B. This method should also be followed when wetting agent type or combination wetting agent/foam blanket type fume suppressants are used to control chromium emissions from a hard chromium electroplating tank and surface tension measurements are conducted to demonstrate continuous compliance.

3. Emission Limitation:

Visible particulate matter emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.

4. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Coating Booth (R001)  
**Activity Description:** Spray booth to apply waterproof coating

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coating booth #1	OAC rule 3745-31-05(A)(3) PTI No. 02-12200	<p>OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.</p> <p>OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.</p> <p>Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).</p>
	OAC 3745-21-07(G)(2)	OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.
	OAC rule 3745-17-07(A)(1)	<p>OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

OAC rule 3745-17-11(B)(1)

Particulate emissions shall not exceed 0.551 pound per hour.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. This emissions unit shall not employ cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.III.2. 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.
2. The permittee shall collect and record the following information on a daily basis for this emissions unit:
  - a. the company identification for each coating employed;
  - b. the company identification of each cleanup material employed and its physical state;
  - c. for each coating and cleanup material, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - d. the number of gallons of each coating and each cleanup material employed;
  - e. the OC content of each coating and cleanup material employed, in pounds per gallon;
  - f. the total operating hours for the emissions unit, in hours per day;
  - g. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., the summation of (d x e) for all coatings and all photochemically reactive cleanup materials employed, in pounds per day;
  - h. for each day during which a cleanup material is employed that is not a photochemically reactive material, the total OC emission rate from all such cleanup materials, i.e., the summation of (d x e) for all such cleanup materials employed, in pounds per day;
  - i. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g / f), in pounds per hour; and
  - j. for each day during which no photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings, i.e., the summation of (d x e) for all the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

### IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.IV.2. 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.
2. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
  - a. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 8 pounds per hour, and the actual OC emissions for each such day; and
  - b. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit annual reports which specify the total OC emissions excluding nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.2.g and j) and the total OC emissions from nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.h) from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.

### V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.V.2. 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.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - 2.a Emission Limitation:

OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the annual emission limitation of 7.3 tons per year shall be demonstrated by summing the daily OC emissions in Sections A.III.2.g and j of these terms and conditions.
  - 2.b Emission Limitation:

OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be demonstrated based upon the record keeping requirements in Section A.III.2 of these terms and conditions.

**V. Testing Requirements (continued)**

**2.c** Emission Limitation:

OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated based upon the recordkeeping requirements in Section A.III.2 of these terms and conditions.

**2.d** Emission Limitation:

OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation of 0.5 ton per year shall be demonstrated by summing the daily OC emissions in Section A.III.3.h of these terms and conditions.

**2.e** Emission Limitation:

Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.

**2.f** Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

**3.** Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coating booth #1	None.	None.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section B.III.2. 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.
2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials employed 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 potentially 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 each of the potential pollutants discharges from R001:

Pollutant: acetone  
 TLV (ug/m3): 1188000  
 Maximum Hourly Emission Rate (lbs/hr): 6.76  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1346  
 MAGLC (ug/m3): 4476

Pollutant: toluene  
 TLV (ug/m3): 188000  
 Maximum Hourly Emission Rate (lbs/hr): 4.98  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 978  
 MAGLC (ug/m3): 4476

### **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 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 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 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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:** Coating Booth (R002)  
**Activity Description:** Spray booth to apply waterproof coating

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coating booth #2	OAC rule 3745-31-05(A)(3) PTI No. 02-12200	OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.
		OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.
		Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).
	OAC 3745-21-07(G)(2)	OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.
		OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

OAC rule 3745-17-11(B)(1)

Particulate emissions shall not exceed 0.551 pound per hour.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. This emissions unit shall not employ cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.III.2. 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.
2. The permittee shall collect and record the following information on a daily basis for this emissions unit:
  - a. the company identification for each coating employed;
  - b. the company identification of each cleanup material employed and its physical state;
  - c. for each coating and cleanup material, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - d. the number of gallons of each coating and each cleanup material employed;
  - e. the OC content of each coating and cleanup material employed, in pounds per gallon;
  - f. the total operating hours for the emissions unit, in hours per day;
  - g. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., the summation of (d x e) for all coatings and all photochemically reactive cleanup materials employed, in pounds per day;
  - h. for each day during which a cleanup material is employed that is not a photochemically reactive material, the total OC emission rate from all such cleanup materials, i.e., the summation of (d x e) for all such cleanup materials employed, in pounds per day;
  - i. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g / f), in pounds per hour; and
  - j. for each day during which no photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings, i.e., the summation of (d x e) for all the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

### IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.IV.2. 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.
2. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
  - a. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 8 pounds per hour, and the actual OC emissions for each such day; and
  - b. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit annual reports which specify the total OC emissions excluding nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.2.g and j) and the total OC emissions from nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.h) from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.

### V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.V.2. 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.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - 2.a Emission Limitation:

OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the annual emission limitation of 7.3 tons per year shall be demonstrated by summing the daily OC emissions in Section A.III.2.g and j of these terms and conditions.
  - 2.b Emission Limitation:

OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be demonstrated based upon the record keeping requirements in Section A.III.2 of these terms and conditions.

## **V. Testing Requirements (continued)**

### **2.c** Emission Limitation:

OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated based upon the recordkeeping requirements in Section A.III.2 of these terms and conditions.

### **2.d** Emission Limitation:

OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation of 0.5 ton per year shall be demonstrated by summing the daily OC emissions in Section A.III.3.h of these terms and conditions.

### **2.e** Emission Limitation:

Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.

### **2.f** Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

### **3.** Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coating booth #2	None.	None.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section B.III.2. 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.
2. The permit to install for this emissions unit (R002) was evaluated based on the actual materials employed 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 potentially 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 each of the potential pollutants discharges from R002:

Pollutant: acetone  
 TLV (ug/m3): 1188000  
 Maximum Hourly Emission Rate (lbs/hr): 6.76  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1346  
 MAGLC (ug/m3): 4476

Pollutant: toluene  
 TLV (ug/m3): 188000  
 Maximum Hourly Emission Rate (lbs/hr): 4.98  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 978  
 MAGLC (ug/m3): 4476

### **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 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 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 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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**

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