



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/16/2013

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: Mullins Rubber Products, Inc.  
Facility ID: 0857770747  
Permit Type: Renewal  
Permit Number: P0110485

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Regional Air Pollution Control Agency





**PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
Mullins Rubber Products, Inc.**

Facility ID:	0857770747
Permit Number:	P0110485
Permit Type:	Renewal
Issued:	5/16/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Mullins Rubber Products, Inc.

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**Proposed Title V Permit**  
Mullins Rubber Products, Inc.  
**Permit Number:** P0110485  
**Facility ID:** 0857770747

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

## Authorization

Facility ID: 0857770747  
Facility Description: Molded Rubber Products  
Application Number(s): A0043989  
Permit Number: P0110485  
Permit Description: Title V permit Renewal for Mullins Rubber Products, Inc. which includes paint booths and open top vapor degreasers.  
Permit Type: Renewal  
Issue Date: 5/16/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0093872

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

Mullins Rubber Products, Inc.  
2949 Valley St.  
Riverside, OH 45404

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Regional Air Pollution Control Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Proposed Title V Permit**  
Mullins Rubber Products, Inc.  
**Permit Number:** P0110485  
**Facility ID:** 0857770747  
**Effective Date:** To be entered upon final issuance

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



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

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

*(Authority for term: ORC 3704.036(A))*

## **2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

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



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

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

### **3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

### **4. Risk Management Plans**

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



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

## **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

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

## **8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

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

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

## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.



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

## **11. Reopening for Cause**

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

## **12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.



- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. An identification of each term or condition of this permit that is the basis of the certification.
    - b. The permittee's current compliance status.
    - c. Whether compliance was continuous or intermittent.
    - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.



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

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

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

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

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

#### **16. Emergencies**

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

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

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

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



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

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

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

## **18. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

## **19. Insignificant Activities or Emissions Levels**

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

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

## **20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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



**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

**22. Permanent Shutdown of an Emissions Unit**

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

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

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

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

**23. Title VI Provisions**

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

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

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



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

The permittee shall submit required reports in the following manner:

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

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

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

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

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



**27. Scheduled Maintenance/Malfunction Reporting**

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

**28. Permit Transfers**

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

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

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

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

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

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



**Proposed Title V Permit**  
Mullins Rubber Products, Inc.  
**Permit Number:** P0110485  
**Facility ID:** 0857770747  
**Effective Date:** To be entered upon final issuance

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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. 40 CFR Part 63, Subpart A, MACT General Provisions

The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A (including the table(s) and appendices referenced in Subpart A). The applicable provisions are identified in Table 2 of 40 CFR Part 63, Subpart Mmmm and Table 2 of 40 CFR Part 63, Subpart Pppp.

3. 40 CFR Part 63, Subpart Mmmm, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating

Emissions Units K001 and R001 are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart Mmmm).

a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Mmmm.

The final rules found in 40 CFR Part 63, Subpart Mmmm establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- (1) all coating operations as defined in 40 CFR 63.3981;
- (2) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- (4) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

[Authority for term 40 CFR 63.3883, 40 CFR 63.3882(b), 40 CFR 63.3940, and 40 CFR 63.3950]

b) The permittee shall comply with the applicable emissions limits, operational limits and work practices of 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3890(b)(4) – Emissions Limits for Existing Rubber-to-Metal Coating Sources	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 4.5 kg (37.7lbs) organic HAP per liter (gallon) coating solids, during each 12-month compliance period.
63.3891 – Compliance Options	The permittee has elected to comply with the emissions limits of 63.3890(b)(4) by using



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	compliant materials or by emission rate without add-on controls.
63.3891(a) – Compliant Material Option	Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit and that each thinner and/or other additive, and cleaning material used contains no organic HAP.
63.3891(b) – Emission Rate Without Add-on Controls	Demonstrate that based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.
63.3892(a) – Operational Limits	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any operating limits.
63.3893(a) - Work Practices	For any coating operation(s) using the compliant material option or the emission rate without add on controls option, the permittee is not required to meet any work practice standards.

- c) The permittee shall comply with the applicable monitoring, record keeping and compliance requirements of 40 CFR Part 63, Subpart M, including the following sections:

63.3900(a)(1)	General compliance requirements for compliant material option and emission rate without add-on controls
63.3930(a)	Record keeping – copies of each notification, report and supporting documentation
63.3930(b)	Record keeping – information from material suppliers and manufacturers
63.3930(c)	Record keeping – dates each compliance options was used and calculations
63.3930(d)	Record keeping – name and volume of each coating, thinner and cleaning material
63.3930(e)	Record keeping – mass fraction of organic HAP for each coating, thinner and cleaning material
63.3930(f)	Record keeping – volume fraction of solids for each coating used
63.3930(g)	Record keeping – density of each coating, thinner, additive and cleaning material
63.3930(h)	Record keeping – optional allowance for waste organic HAP treatment, storage or disposal
63.3930(j)	Record keeping - deviations
63.3931(a)	Records maintenance - availability



63.3931(b)	Records maintenance - duration -
63.3931(c)	Records maintenance – on-site and off-site records
63.3940	Initial compliance demonstration deadline for compliant coatings
63.3941	Initial compliance requirements for compliant coatings
63.3941(a) and 63.3951(a)	Compliance requirements – mass fraction of organic HAP
63.3941(b) and 63.3951(b)	Compliance requirements - volume fraction of coating solids
63.3941(c)	Compliance requirements – density of each coating
63.3941(d)	Compliance requirements – organic HAP content of each coating
63.3941(e)	Compliance demonstration
63.3942(a)	Continuous compliance demonstration requirements for compliant coatings
63.3942(b)	Continuous compliance requirements for compliant coatings - deviation reporting
63.3942(c)	Semiannual compliance statement for compliant coatings with no deviations
63.3942(d) and 63.3952(d)	Compliance records maintenance
63.3950	Initial compliance demonstration deadline for emission rate without add-on controls
63.3951	Initial compliance requirements for emission rate without add-on controls
63.3951(c)	Compliance requirements – density of each material
63.3951(d)	Compliance requirements – volume of each material used
63.3951(e)	Compliance requirements – calculate the mass organic HAP emissions
63.3951(f)	Compliance requirements – calculate the total volume of coating solids
63.3951(g)	Compliance requirements – calculate the organic HAP emission rate
63.3951(h)	Compliance demonstration
63.3952	Continuous compliance requirements for emission rate without add-on controls
63.3952(a)	Continuous compliance demonstration requirements for emission rate without add-on controls
63.3952(b)	Continuous compliance requirements for emission rate without add-on controls - deviation reporting
63.3952(c)	Continuous compliance requirements for emission rate without add-on controls with no



	deviations
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- d) The permittee shall comply with the applicable notification and reporting requirements of 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3910(a)	General notification requirements
63.3910(b)	Initial notification requirements
63.3910(c)	Notification of compliance status
63.3920(a)	Reporting requirements – Semiannual compliance reports
63.3941(e)	Initial compliance statement for compliant coatings
63.3951(h)	Initial compliance statement for emission rate without add-on controls

4. 40 CFR Part 63, Subpart Pppp, NESHAP for Plastic Parts Surface Coating

Emissions Units K001 is subject to the NESHAP for Plastic Parts Surface Coating.

- a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Pppp.

The final rules found in 40 CFR Part 63, Subpart Pppp establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- (1) all coating operations as defined in 40 CFR 63.4581;
- (2) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- (4) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

[Authority for term 40 CFR 63.4483, 40 CFR 63.4482(b), 40 CFR 63.4540 and 40 CFR 63.4550]

- b) The permittee, has chosen to use either the “compliant material” or “without add-on control” options for these emissions units.

- (1) When using the “compliant material” option, the permittee shall not apply any coating in the coating operation(s) with an organic HAP content greater than the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does



not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

- (2) When using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

[Authority for term 40 CFR 63.4491(a), 40 CFR 63.4491(b), 40 CFR 63.4500(a), 40 CFR 63.4540, 40 CFR 63.4541, 40 CFR 63.4542, 40 CFR 63.4550, 40 CFR 63.4551 and 40 CFR 63.4552]

- c) The permittee shall comply with the applicable record keeping requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4530	Record keeping
63.4531	Records maintenance and duration
63.4540	Initial compliance demonstration date for compliant coatings
63.4541	Initial compliance demonstration procedures for compliant coatings
63.4542	Continuous compliance for compliant coatings
63.4550	Initial compliance demonstration date without add-on controls
63.4551	Initial compliance demonstration procedures without add-on controls
63.4552	Continuous compliance without add-on controls

- d) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4510	Notification requirements
63.4520	Reporting requirements

- 5. K001:  
 Predominant Surface Coating Activity Alternative Compliance Option for 40 CFR Part 63 Subpart MMMM and 40 CFR Part 63 Subpart PPPP:

According to 40 CFR Part 63.3881(e)(2) and 40 CFR Part 63.4481(e)(2), in lieu of compliance with both 40 CFR Part 63 Subpart MMMM and 40 CFR Part 63 Subpart PPPP the permittee may comply with the emission limitation representing the predominant surface coating activity at the facility.

Should the permittee choose the predominant surface coating activity alternative compliance option, then the permittee must determine the predominant surface coating activity at the facility in order to establish the applicable rule requirements. The predominant activity is identified as the surface coating activity that accounts for 90% or more of the permittee’s coating operations.



This determination shall be performed annually as stated in 40 CFR Part 63.3881(e)(2)(ii) of Subpart M MMM and 40 CFR Part 63.4481(e)(2)(ii) of Subpart P PPP and shall be submitted to RAPCA by January 31 of each year.

6. Facility-Specific Emission Limit Alternative Compliance Option for 40 CFR Part 63 Subpart M MMM and 40 CFR Part 63 Subpart P PPP:

According to 40 CFR Part 63.3881(e)(3) and 40 CFR Part 63.4481(e)(3), in lieu of compliance with both 40 CFR Part 63 Subpart M MMM and 40 CFR Part 63 Subpart P PPP, the permittee may comply with the facility-specific emission limitation.

Should the permittee choose the facility-specific emission limit alternative compliance option, then the permittee must determine the facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit (i.e., emissions limits in 40 CFR Part 63 Subpart M MMM and 40 CFR Part 63 Subpart P PPP) in order to establish the applicable rule requirements. The facility-specific emission limit is calculated from the relative amount of coating activity that is subject to each emission limit on a monthly basis using the coating data for the relevant 12-month compliance period. The procedures for calculating the facility-specific emission limit are specified in 40 CFR Part 63.3890(c)(2) and 40 CFR Part 63.4490(c)(2).

7. 40 CFR 63 Subpart P PPP Exemption

According to 40 CFR Part 63.4481(b), a facility that is a major source of HAP emissions is subject to 40 CFR Part 63 Subpart P PPP if it uses 100 gallons per year or more of HAP-containing coatings in surface coating of plastic parts and products. Coatings that meet the definition of non-HAP coating in 40 CFR Part 63.4581 are not included in determining whether the facility uses 100 gallons per year, or more, of coatings in the surface coating of plastic parts and products. The usage of HAP-containing coatings in surface coating of plastic parts and products shall be determined based upon a rolling, 12-month period. If the facility usage of HAP-containing coatings in surface coating of plastic parts and products is less than 100 gallons per rolling, 12-month period, then the facility is exempt from the requirements of 40 CFR Part 63 Subpart P PPP and their usage is not required to be considered in the determination of compliance with 40 CFR Part 63 Subpart M MMM.



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**Facility ID:** 0857770747  
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## **C. Emissions Unit Terms and Conditions**



**1. K001, Metal and Plastic Parts Paint Booth**

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

Misc. metal parts coating booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04782 issued 12/19/2006	The emissions of Volatile Organic Compound (VOC) from this emissions unit shall not exceed 11.76 tons/year from coatings and cleanup materials.  The Particulate Emission (PE) from this emissions unit shall not exceed 0.551 lb/hr and 2.41 tons/year.  The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i), OAC rule 3745-17-11(B)(1), OAC rule 3745-17-07(A)(1), 40 CFR Part 63, Subpart A, MMMM and PPPP.
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-17-11(B)(1)	The requirement established pursuant to this rule is equivalent to the short term PE limit included in OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
e.	40 CFR Part 63, Subpart A General Provisions	Table 2. of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart PPPP identify the applicable provisions of 40 CFR Part 63.1-15.
f.	40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) [40 CFR Part 63.3890(b)(4)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 4.5 kg (37.7lbs) organic HAP per liter (gallon) coating solids, during each 12-month compliance period.  See Section B.3. and B.5
g.	40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) [40 CFR Part 63.4490(b)(1)]	The organic HAP emissions from plastic parts and products coating shall not exceed 0.16 kilogram (0.16 lb) per kilogram (lb) coating solids used during each 12-month compliance period.  See Section B.4. and B.5.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for control of particulate emissions whenever the paint spraying application associated with this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04782]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

- a. The name and identification number of each coating employed.
- b. The VOC content of each coating employed, in pounds per gallon, as applied.
- c. The number of gallons of each coating employed.
- d. On the days when coating metal parts, the total volume in gallons of all coating employed for the coating of metal parts.
- e. The total VOC emissions from all coatings employed, in pounds [i.e., the summation of d)(1)b. x d)(1)c. for each coating employed].



[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

- (2) The permittee shall collect and record the following information for each month for this emissions unit:
- a. The company identification of each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The VOC content of each cleanup material employed, in pounds per gallon.
  - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., summation of d)(2)b. x d)(2)c. for each coating employed], in pounds per month.
  - e. The amount of cleanup material recovered, in pounds.
  - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(2)d. – d)(2)e.].

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(1) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(2)].

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

- (4) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the paint spraying application associated with this emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

- (2) The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service when the paint spraying application associated with this emissions unit was in operation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

- (4) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15<sup>th</sup> of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04782]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)d.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

b. Emissions Limitation:

The emissions of VOC from this emissions unit shall not exceed 11.76 TPY from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

c. Emission Limitation:

0.551 lb of PE per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:



$E = \text{maximum coating solids usage rate, in pounds per hour, } \times (1-TE) \times (1-CE)$

Where  $E = \text{PE rate (lbs/hr)}$ ;

$TE = \text{fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55)}$ ; and

$CE = \text{fractional control efficiency of the control equipment (0.99)}$ .

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

d. Emission Limitation:

2.41 tons of PE per year

Applicable Compliance Method:

Compliance with the lb/hr emission limit demonstrates compliance with this limit because this limit is based on the lb/hr limit assuming the source operated 8760 hours per year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

e. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 or USEPA Method 24A to determine the VOC contents of the coatings. If, pursuant to section 11.4 of USEPA method 24, as contained in 40 CFR Part 60 Appendix A, an owner or operator determines that USEPA Method 24 or USEPA Method 24A cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for USEPA Method 24 or USEPA Method 24A.



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**Facility ID:** 0857770747

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

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04782]

g) Miscellaneous Requirements

(1) None.



**2. R001, Metal Preparatory Room Adhesive Coating Process**

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

Metal Preparatory Room Adhesive Coating Process

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
b.	40 CFR Part 63, Subpart A General Provisions	Table 2. of 40 CFR Part 63, Subpart Mmmm identifies the applicable provisions of 40 CFR Part 63.1-15.
c.	40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) [40 CFR Part 63.3890(b)(4)]	The organic hazardous air pollutant (HAP) emissions from metal parts and products coating shall be limited to no more than 4.5 kg (37.7lbs) organic HAP per liter (gallon) coating solids, during each 12-month compliance period.  See Section B.3.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:



- a. The name and identification number of each coating employed.
- b. The number of gallons of each coating employed.
- c. The total volume in gallons of all coating employed.

[Authority for Term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3)]

- (2) The permittee shall notify the director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

Emissions Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

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

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group -Vapor Degreaser: L001,L002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
L001	trichloroethylene open top vapor degreaser with freeboard refrigeration device, reduced room draft and a freeboard ratio of 1.0
L002	trichloroethylene open top vapor degreaser with freeboard refrigeration device, reduced room draft and a freeboard of 1.0

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0112854	The facility-wide annual emissions limit of Trichloroethylene for vapor degreasers shall not exceed the 12-month rolling limit of 14,100 kg/yr (31,085 lbs/yr).  See b)(2)a.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
b.	40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning)	The facility-wide annual emissions limit of Trichloroethylene shall not exceed the 12-month rolling limit of 14,100 kg/yr (31,085 lbs/yr).
c.	OAC rule 3745-21-09(O)(3)	Exempt pursuant to OAC rule 3745-21-09(O)(6).

(2) Additional Terms and Conditions

a. The batch vapor cleaning machine, having a solvent/air interface area greater than 1.21 square meters (13 square feet), shall employ 1.0 Freeboard Ratio, Freeboard Refrigeration Device and Reduced Room Draft, as the chosen control combination selected from Table 2 of Subpart T [40 CFR 63.463(b)].



- b. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
  - i. The vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - ii. The permittee shall use a reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time.
  - iii. The solvent cleaning machine's automated parts handling system shall move the parts or parts baskets at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed), from the initial loading of parts through removal of cleaned parts.
  
- c) Operational Restrictions
  - (1) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance, as described in the "*Monitoring and Record keeping Requirements*" section of this permit; and these parameters shall meet the requirements established in this permit.  
  
[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart T and PTI P0112854]
  - (2) The permittee shall ensure that the chilled air blanket temperature, measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.  
  
[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart T and PTI P0112854]
  - (3) The permittee shall ensure that the flow or movement of air within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures outlined in the "*Monitoring and Record keeping Requirements*" section of this permit; and shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.  
  
[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart T and PTI P0112854]
  - (4) The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.  
  
[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart T and PTI P0112854]



d) Monitoring and/or Recordkeeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (2) The permittee shall maintain monthly a log of solvent additions and deletions for the solvent cleaning machine.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (3) The permittee shall calculate the monthly emissions from each emissions unit using the following equation and using the records of all solvent additions and deletions from the previous month:

$$E_n = S_{Ai} - LSR_i - *SSR_i$$

where:

$E_n$  = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period  $i$  (kg or lbs of solvent per month)

$S_{Ai}$  = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period  $i$  (kg or lbs of solvent per month)

$LSR_i$  = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period  $i$  (kg or lbs of solvent per month)

$SSR_i$  = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, during the most recent monthly reporting period  $i$  (kg or lbs of solvent per month)

\* The permittee shall determine  $SSR_i$  from tests conducted using reference method 25d or from engineering calculations included in the compliance report.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]



- (4) The permittee shall on the first operating day of the month, determine the 12-month rolling total emissions from each emissions unit, for the 12-month period ending with the most recent month.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (5) The permittee shall on the first operating day of every month, determine the 12-month rolling total emissions from the facility, for the 12-month period ending with the most recent month using the following equation:

$ET_{\text{facility}}$  = the total halogenated HAP solvent emissions over the preceding 12 months for all the emissions units at the facility, (kg or lbs of solvent per 12-month period).

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (6) The permittee shall on the first operating day of every month demonstrate compliance with the facility-wide emissions limit on a rolling 12-month basis. If the applicable Facility-wide TCE emission limit of 14,100 kg/yr (31,085 lbs/yr) is not met, an exceedance has occurred. All exceedances shall be reported as required in e)(2).

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

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

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (8) The permittee shall conduct an initial monitoring test, and a quarterly test thereafter, of the wind speed, measured within 6 inches above the top of the freeboard area of the solvent cleaning machine. The test shall be conducted as follows:

- a. the direction of the wind current shall be determined by slowly rotating a velometer or similar device until the maximum speed is located;
- b. the velometer (or similar device) shall be oriented in the direction of the wind current at each of the four corners of the machine, and the reading from each corner recorded; and
- c. the average wind speed of the four corners shall be calculated and maintained on record.

On a weekly basis the permittee shall monitor the room parameters that were used to establish initial compliance and achievement of reduced room draft. A record of the test results and monitored room parameters shall be maintained on file or in an operational log.



[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (9) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
- a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
  - b. records of the halogenated HAP [trichloroethylene] solvent content for each solvent used in the solvent cleaning machine; and
  - c. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for 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.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI P0112854]

- (2) The permittee shall submit an exceedance report on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the regulating agency of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:
- a. the emissions unit has demonstrated a full year of compliance without an exceedance;
  - b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and
  - c. the regulating agency 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 63.10, General Provisions.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]



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

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (4) The permittee shall submit an exceedance report if no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and was not corrected within 15 days of detection.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (5) The permittee shall submit an exceedance report if the freeboard ratio is not maintained at 1.0 or greater.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]

- (6) The permittee shall submit a solvent emissions report each year. This solvent report shall contain the following requirements:

- a. The average monthly solvent consumption for the vapor degreasers in Kilograms per month.
- b. The rolling 12-month total solvent emission estimates calculated each month using the method as described in d)(3),(4), and d)(5).

This report can be combined with the annual report as required in e)(7) into a single report for the facility.

- (7) The permittee shall submit an annual report by February 1 of each year, following the year for which the report is being made. This report shall contain the following information:

- a. a signed statement, by the facility owner or his designee, stating that all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard"; and
- b. an estimate of solvent consumption during the reporting period.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 63, Subpart T and PTI P0112854]



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation/Control Requirements:

The permittee has selected or has installed and shall employ control combination 1.0 Freeboard Ratio, Freeboard Refrigeration Device and Reduced Room Draft, as the control combination required from Table 2, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, 1.0 Freeboard Ratio, Freeboard Refrigeration Device and Reduced Room Draft, through compliance with the *Additional Terms and Conditions, Operational Restrictions, and Monitoring and Record keeping Requirements and Testing Requirement* sections of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0112854]

b. Emissions Limitation/Control Requirements:

The chilled air blanket temperature measured at the center of the air blanket shall be no greater than 30% of the solvent's boiling point.

Applicable Compliance Method:

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0112854]

c. Emissions Limitation/Control Requirements:

The flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure shall not exceed 15.2 meters/minute (50 feet/minute).

Applicable Compliance Method:

The permittee shall conduct quarterly monitoring tests of the windspeed and weekly monitoring of the room parameters, following the initial monitoring test. The windspeed shall be measured within 6 inches above the top of the freeboard area and at each corner of the solvent cleaning machine using a velometer or similar device, and rotating it until the maximum speed is located. The average windspeed of that measured at each corner shall be calculated. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be in compliance.



[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0112854]

d. Emissions Limitation/Control Requirements:

The freeboard ratio shall not exceed 1.0.

Applicable Compliance Method:

The permittee shall measure and record the freeboard ratio to assure compliance with the control requirement limitation. A one-time measurement is sufficient unless the location of solvent air interface and/or the dimensions (length, width, or height) of the batch vapor degreasers are modified.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0112854]

e. Emissions Limitation/Control Requirements:

The facility-wide annual emissions limit of Trichloroethylene shall not exceed the 12-month rolling limit of 14,100 kg/yr (31,085lbs/yr)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(5).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0112854].

g) Miscellaneous Requirements

(1) None.