



10/30/2013

Certified Mail

MARK KAST  
Canton Plating Co., Inc.  
903 - 9TH NE  
CANTON, OH 44704

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1576050238  
Permit Number: P0101196  
Permit Type: Initial Installation  
County: Stark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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 you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Canton



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Canton Plating Co., Inc.**

Facility ID:	1576050238
Permit Number:	P0101196
Permit Type:	Initial Installation
Issued:	10/30/2013
Effective:	10/30/2013
Expiration:	10/30/2023





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Canton Plating Co., Inc.

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**Final Permit-to-Install and Operate**  
Canton Plating Co., Inc.  
**Permit Number:** P0101196  
**Facility ID:** 1576050238  
**Effective Date:** 10/30/2013

## Authorization

Facility ID: 1576050238  
Application Number(s): A0032974, A0041796, A0047572  
Permit Number: P0101196  
Permit Description: Initial installation permit for a trichloroethylene open top vapor degreaser.  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 10/30/2013  
Effective Date: 10/30/2013  
Expiration Date: 10/30/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Canton Plating Co., Inc.  
903 9th St. NE  
Canton, OH 44704

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
Canton Plating Co., Inc.  
**Permit Number:** P0101196  
**Facility ID:** 1576050238  
**Effective Date:** 10/30/2013

## Authorization (continued)

Permit Number: P0101196

Permit Description: Initial installation permit for a trichloroethylene open top vapor degreaser.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>L002</b>
Company Equipment ID:	Degreaser
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
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**Permit Number:** P0101196  
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**Effective Date:** 10/30/2013

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



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Canton Plating Co., Inc.  
**Permit Number:** P0101196  
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## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

2. Definitions as used in this permit:

*Administrator* means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.

*Air blanket* means the layer of air inside the solvent cleaning machine freeboard located above the solvent/air interface. The centerline of the air blanket is equidistant between the sides of the machine.

*Automated parts handling system* means a mechanical device that carries all parts and parts baskets at a controlled speed from the initial loading of soiled or wet parts through the removal of the cleaned or dried parts.

*Cover* means a lip, top, or portal cover that shields the solvent cleaning machine openings from air disturbances when in place and is designed to be easily opened and closed without disturbing the vapor zone.

*Downtime mode* means the time period when a solvent cleaning machine is not cleaning parts and the sump heating coils are turned off.

*Freeboard area* means the area within the solvent cleaning machine that extends from the solvent/air interface to the top of the solvent cleaning machine.

*Freeboard ratio* means the ratio of the solvent cleaning machine freeboard height to the smaller interior dimension (length, width, or diameter) of the solvent cleaning machine.

*Freeboard refrigeration device (also called a chiller)* means a set of secondary coils mounted in the freeboard area that carries a refrigerant or other chilled substance to provide a chilled air blanket above the solvent vapor.

*Idling mode* means the time period when a solvent cleaning machine is not actively cleaning parts and the sump heating coils are turned on.

*Lip exhaust* means a device installed at the top of the opening of a solvent cleaning machine that draws in air and solvent vapor from the freeboard area and ducts the air and vapor away from the solvent cleaning area.



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*Primary condenser* means a series of circumferential cooling coils on a vapor cleaning machine through which a chilled substance is circulated or recirculated to provide continuous condensation of rising solvent vapors and, thereby, create a concentrated solvent vapor zone.

*Solvent cleaning machine* means any device or piece of equipment that uses halogenated hazardous air pollutant (HAP) solvent liquid or vapor to remove soils from the surfaces of materials.

*Solvent vapor zone* means the area that extends from the liquid solvent surface to the level that solvent vapor is condensed. This condensation level is defined as the midline height of the primary condenser coils.

*Solvent/air interface area* means the surface area of the solvent vapor zone that is exposed to the air.



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



**1. L002, Degreaser**

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

Open Top Vapor Degreaser (Phillips Model #EV 322E, I.D. #16097) that uses Trichloroethylene to clean steel fabricated and machined parts. This emission unit is equipped with a refrigerated freeboard chiller that operates between -10° and -20° Fahrenheit and a manual bi-parting cover which opens only when the part is actually entering or exiting the degreaser.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 04/12/1996. [Best Available Technology (BAT) for sources installed in 1997]	Volatile organic compounds (VOC) emissions shall not exceed 0.91 tons per year as trichloroethylene. See b)(2)a.
b.	OAC rule 3745-21-09(O)	Exempt. See b)(2)b.
c.	40 CFR Part 63, Subpart A (40 CFR 63.1-63.16)	Appendix B to Subpart T of Part 63 lists the General Provisions Applicability to Subpart T



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart T (40 CFR 63.460-63.471)  See b)(2)c.	[63.463(a)-(b), and 63.471]  See b)(2)d., b)(2)e., b)(2)f., and c)(1)-(3).

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements include the controls specified in term b)(2)e. of this permit and compliance with the requirements of 40 CFR Part 63, Subpart T.
- b. Pursuant to OAC rule 3745-21-09(O)(6)(b), paragraphs (O)(2) through (O)(5) of this rule shall not apply to any solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions of a permit-to-install and operate (PTIO).
- c. Pursuant to §63.460(a), the provisions of 40 CFR Part 63, Subpart T apply to each individual batch vapor cleaning machine that uses any solvent containing trichloroethylene (CAS No. 79-01-6) in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- d. Pursuant to §63.471(a), this is an affected facility located at an area source, defined as all solvent cleaning machines, except cold batch cleaning machines, and is subject to the facility-wide emission limitation in 63.471(b)(2). However, since the potential to emit and the BAT emission limit for this source is less than the facility-wide limitation, the facility-wide limitation is less stringent and does not apply.
- e. [40 CFR 63.463(b)(1)(i)] The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ Option 3 (freeboard refrigeration device and working-mode cover), as the chosen control combination selected from Table 1 of 40 CFR Part 63, Subpart T.
- f. The batch vapor cleaning machine shall be operated to meet the following control equipment or technique requirements:
  - i. [40 CFR 63.463(a)(1)(i)] An idling and downtime mode cover that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
  - ii. [40 CFR 63.463(a)(1)(2)] Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - iii. [40 CFR 63.463(a)(3)] The cleaning machine shall have an automated parts handling system (hoist) 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. [40 CFR 63.463(a)(4)] 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.
- v. [40 CFR 63.463(a)(5)] The vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor cleaning machine rises above the height of the primary condenser.
- vi. [40 CFR 63.463(a)(6)] The vapor cleaning machine shall have a primary condenser.

c) Operational Restrictions

- (1) This emissions unit shall not employ a lip exhaust or any other exhaust system within the machine.
- (2) The permittee shall meet all of the following required work and operational practices:
  - a. [40 CFR 63.463(d)(1)(i)] Air disturbances across the solvent cleaning machine shall be controlled by using an idling and downtime mode cover that shall be in place during the idling and downtime modes, unless:
    - i. The solvent has been removed from the machine; or
    - ii. Maintenance or monitoring is being performed that requires the cover(s) to not be in place.
  - b. [40 CFR 63.463(d)(2)] The parts baskets or the parts being cleaned in an open-top batch vapor 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. [40 CFR 63.463(d)(3)] 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. [40 CFR 63.463(d)(4)] Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Administrator.
  - e. [40 CFR 63.463(d)(5)] Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
  - f. [40 CFR 63.463(d)(6)] During startup of the vapor cleaning machine, the primary condenser shall be turned on before the sump heater.



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- g. [40 CFR 63.463(d)(7)] During shutdown of each vapor 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. [40 CFR 63.463(d)(8)] When solvent is added or drained from any 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. [40 CFR 63.463(d)(9)] The solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
  - j. [40 CFR 63.463(d)(10)] Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A of 40 CFR Part 63 if requested during an inspection by the Administrator.
  - k. [40 CFR 63.463(d)(11)] 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.
  - l. [40 CFR 63.463(d)(12)] Sponges, fabric, wood, and paper products shall not be cleaned.
- (3) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance with 40 CFR 63.463, as described in terms d)(2)-(4) of this permit; and these parameters shall meet the following requirements established in this permit:
- a. [40 CFR 63.463(e)(2)(i)] The permittee shall ensure that the chilled air blanket temperature (in °F) is measured at the center of the air blanket, and is no greater than 30 percent of the solvent's boiling point.
  - b. [40 CFR 63.463(e)(2)(iii)(A)] The permittee shall ensure that the working-mode cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
  - c. [40 CFR 63.463(e)(2)(iii)(B)] The permittee shall ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
  - d. [40 CFR 63.463(e)(2)(iv)(A)] The permittee shall ensure that the idling-mode cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
  - e. [40 CFR 63.463(e)(2)(iv)(B)] The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.



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

- (1) The permittee shall collect and record the following information each month for the solvent cleaning machine. These records shall be kept for a period of not less than five years:
  - a. The identification of the degreasing solvent employed;
  - b. The total amount, in gallons, of degreasing solvent used;
  - c. The total amount, in gallons, of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation; and
  - d. The net gallons of solvent consumed as calculated by "b" minus "c".
  - e. The total monthly trichloroethylene emission rate, in tons per month, as calculated as shown in term f)(1)a. of this permit.

To calculate the annual emission rate, the monthly emission rate values from d)(1)e. above for all the twelve months within the year shall be added together.

- (2) [40 CFR 63.466(a)(1)] 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.
- (3) [40 CFR 63.466(b)(1)] The permittee shall conduct a monthly visual inspection of the working-mode/idling-mode/downtime cover(s) and shall maintain a record of the results. The records shall document if the cover is opening and closing properly, and if it completely covers the cleaning machine openings when closed, and if it is free of cracks, holes and other defects.
- (4) [40 CFR 63.466(c)] The permittee shall monitor the hoist speed as described below and maintain records of the results:
  - 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 document that the parts and parts basket does not occupy more than 50 percent of the solvent/air interface area, if the hoist speed exceeds 0.9 meters per minute (3 feet per minute). The determination shall be recalculated if the parts or basket size increase.
  - c. The permittee shall conduct quarterly monitoring of the hoist speed.
  - d. 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.



- (5) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:
- a. The device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
  - b. The vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
  - c. The primary condenser.

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

- (6) An exceedance has occurred if:
- a. [40 CFR 63.463(e)(3)(i)] The requirements of terms c)(3)b. and c)(3)d. of this permit have not been met
  - b. [40 CFR 63.463(e)(3)(ii)] The requirements of terms c)(3)a., c)(3)c., and c)(3)e. of this permit have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning systems or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

- (7) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
- a. [40 CFR 63.467(a)(1)] The owner's manual, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
  - b. [40 CFR 63.467(a)(2)] The date of installation for the solvent cleaning machine and all of its control devices; and
  - c. [40 CFR 63.467(a)(5)] Records of the halogenated hazardous air pollutant (HAP) trichloroethylene solvent content for each solvent used in the solvent cleaning machine.

- (8) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
- a. [40 CFR 63.467(b)(1)] The results of the control device monitoring required in this permit as specified in terms (d)(2)-(4) of this permit;
  - b. [40 CFR 63.467(b)(2)] Information on the actions taken to comply with terms c)(3) and d)(6) of this permit, including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring



conducted to demonstrate that monitored parameters have returned to acceptable levels; and

- c. [40 CFR 63.467(b)(3)] Estimates of the annual trichloroethylene consumption (annual summation of values recorded per term d)(1)e. of this permit).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency (Canton City Health Department, Air Pollution Control Division) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA "eBusiness Center: Air Services" although PERs can be submitted via mail or can be hand delivered.
- (2) The permittee shall identify the following information in the annual PER report:
  - a. [40 CFR 63.468(f)(1)] 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 in §63.463(d)(10)"; and
  - b. [40 CFR 63.468(f)(2)] An estimate of solvent consumption during the reporting period as recorded per term d)(8)c. of this permit.
  - c. The length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced, of any of the following control equipment that was not repaired or replaced within 15 days of any malfunction, and/or the machine was not shut down until repaired:
    - i. The device that shuts off the sump heat if the sump liquid solvent levels drops to the sump heater coils;
    - ii. The vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and
    - iii. The primary condenser.
- (3) [40 CFR 63.468(h)] The permittee shall submit a deviation or exceedances report (as described in term e)(4) of this permit) 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 exceedances 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. [40 CFR 63.468(i)(1)] The emissions unit has demonstrated a full year of compliance without an exceedance;
  - b. [40 CFR 63.468(i)(2)] The permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions and in 40 CFR Part 63, Subpart T (as included in the terms and conditions of this permit); and
  - c. [40 CFR 63.468(i)(3)] The regulating agency does not object to a reduced frequency of reporting for the affected emissions unit as provided in 40 CFR 63.1(e)(3)(iii).
- (4) [40 CFR 63.468(h)] Each exceedance report shall be submitted by the 30<sup>th</sup> day following the reporting period and shall contain the following information:
- a. [40 CFR 63.468(h)(2)] If an exceedance has occurred, the standard, monitored parameter, emission limit, or other requirement that was exceeded; the reason for the exceedance and a description of the actions taken; the actions taken to correct any future exceedance of the same limit or requirement; and the magnitude and duration of each exceedance;
  - b. [40 CFR 63.468(h)(1)] Action(s) taken to comply with term c)(3) of this permit (as recorded per term d)(8)b. of this permit) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
  - c. [40 CFR 63.468(h)(3)] If no exceedance of a parameter has occurred, or a piece of equipment has not been inoperable, out of control, repaired, or adjusted, a statement to that effect shall be submitted.
  - d. [40 CFR 63.463(e)(4)] If no exceedance has occurred, due to corrections and adjustments made to avoid an exceedance, a statement specifying those details shall be submitted.
- f) Testing Requirements
- (1) Compliance with the applicable emissions limitations/control measures in the terms and conditions of this permit shall be determined in accordance with the following methods:
- a. Emissions Limitation:  
Volatile organic compounds (VOC) emissions shall not exceed 0.91 tons per year.
- Applicable Compliance Method:
- The emission limitation was established by multiplying the maximum number of gallons of TCE used each year (230 gal/yr) by the maximum VOC content of the solvent used (12.17 lb/gal). The minimum annual pounds of recovered waste solvent (979.69 lb VOC/yr) was then subtracted from that value (2,799.1 lb/yr).



The difference was then multiplied by the mass conversion of 1 ton/2,000 lbs to give the annual ton/yr of VOC emissions, as shown below.

$$230 \frac{gal}{yr} * 12.17 \frac{lb VOC}{gal} = 2799.1 \frac{lb}{yr} VOC_{used}$$

$$2799.1 \frac{lb}{yr} VOC_{used} - 979.69 \frac{lb}{yr} VOC_{recovered} = 1819.41 \frac{lb}{yr} VOC$$

$$1819.41 \frac{lb}{yr} VOC * \frac{1 ton}{2000 lb} \approx 0.91 \frac{ton}{yr} VOC$$

Actual emissions can be calculated using similar methodology by substituting actual used solvent and recovered solvent values.

Compliance shall be demonstrated based on the recordkeeping required by term d)(1) of this permit.

b. Emissions Limitation/Control Requirements:

The permittee has selected or has installed and shall employ Option 3, as the control combination required from Table 1, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, freeboard refrigeration device and working-mode cover, through compliance with the “Additional Terms and Conditions”, “Operational Restrictions”, and “Monitoring and Recordkeeping Requirements” and “Testing Requirement” sections of this permit.

c. 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. Compliance shall be demonstrated based on the monitoring and recordkeeping required by terms c)(3)a. and d)(2) of this permit.

d. Emissions Limitation/Control Requirements:

The working-mode/idling-mode cover shall completely cover the cleaning machine openings when closed and be maintained free of cracks, holes, and other defects.

Applicable Compliance Method:

Compliance shall be demonstrated based on the monitoring and recordkeeping required by term d)(3) of this permit.



e. Emissions Limitation/Control Requirements:

The hoist speed shall not exceed 3.4 meters per minute (11 feet per minute).

Applicable Compliance Method:

Compliance shall be demonstrated based on the monitoring and recordkeeping required by term d)(4) of this permit.

f. Emissions Limitation/Control Requirements:

The vapor cleaning machine shall have a freeboard ratio of 0.75 or greater.

Applicable Compliance Method:

Compliance shall be assumed based on the design specifications of the cleaning machine as submitted by the permittee in the permit application. The Height (distance from the midpoint of the primary condenser coils to the top edge of the tank) is 32 inches. The Width (width, no length, at the top of the vapor zone) is 36 inches. The Freeboard ratio (height/width) is calculated as 1.12, which is greater than 0.75.

g) Miscellaneous Requirements

- (1) In accordance with 40 CFR 63.469, upon written application, the Administrator may approve the use of equipment or procedures after they have been satisfactorily demonstrated to be equivalent, in terms of reducing emissions of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform to the atmosphere, to those prescribed for compliance within a specified paragraph of this subpart. The application must contain a complete description of the equipment or procedure and the proposed equivalency testing procedure and the date, time, and location scheduled for the equivalency demonstration.