



10/30/2013

Certified Mail

CHARLES CHALFANT  
KORNYLAK CORP.  
400 HEATON STREET  
HAMILTON, OHIO, OH 45011

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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: 1409040156  
Permit Number: P0115516  
Permit Type: Renewal  
County: Butler

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 Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
KORNYLAK CORP.**

Facility ID:	1409040156
Permit Number:	P0115516
Permit Type:	Renewal
Issued:	10/30/2013
Effective:	10/30/2013
Expiration:	10/30/2023





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
KORNYLAK CORP.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
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? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. K001, Paint Spray Booth.....	11
2. K002, Dip Tank.....	13
3. L001, Batch vapor degreaser .....	17
4. L002, In-line vapor degreaser .....	22





**Final Permit-to-Install and Operate**  
**KORNYLAK CORP.**  
**Permit Number: P0115516**  
**Facility ID: 1409040156**  
**Effective Date: 10/30/2013**

## Authorization

Facility ID: 1409040156  
 Application Number(s): A0048972  
 Permit Number: P0115516  
 Permit Description: Renewal PTIO for K001 - miscellaneous metal parts paint booth, K002 - Skate Wheel dip tank, L001 - open-top vapor degreaser and L002 - in-line vapor degreaser.  
 Permit Type: Renewal  
 Permit Fee: \$0.00  
 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:

KORNYLAK CORP.  
 400 HEATON STREET  
 Hamilton, OH 45011

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

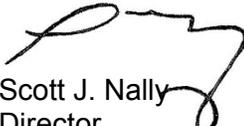
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
 250 William Howard Taft Rd.  
 Cincinnati, OH 45219  
 (513)946-7777

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



## Authorization (continued)

Permit Number: P0115516

Permit Description: Renewal PTIO for K001 - miscellaneous metal parts paint booth, K002 - Skate Wheel dip tank, L001 - open-top vapor degreaser and L002 - in-line 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>K001</b>
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	P0096994
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Dip Tank
Superseded Permit Number:	14-05432
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>L001</b>
Company Equipment ID:	Batch vapor degreaser
Superseded Permit Number:	P0096991
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>L002</b>
Company Equipment ID:	In-line vapor degreaser
Superseded Permit Number:	P0096992
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
KORNYLAK CORP.  
**Permit Number:** P0115516  
**Facility ID:** 1409040156  
**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**  
KORNYLAK CORP.  
**Permit Number:** P0115516  
**Facility ID:** 1409040156  
**Effective Date:** 10/30/2013

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



**Final Permit-to-Install and Operate**

KORNYLAK CORP.

**Permit Number:** P0115516

**Facility ID:** 1409040156

**Effective Date:** 10/30/2013

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.



**Final Permit-to-Install and Operate**  
KORNYLAK CORP.  
**Permit Number:** P0115516  
**Facility ID:** 1409040156  
**Effective Date:** 10/30/2013

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



**1. K001, Paint Spray Booth**

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

Miscellaneous Metal Paint Spray Booth

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 3745-21-09(U)(2)(e)(ii)	See b)(2)a.
b.	OAC rule 3745-17-11(C)	Exempt. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

b. The requirements of OAC rule 3745-17-11(C) are not applicable to this emissions unit pursuant to the rule exemption specified in OAC rule 3745-17-11 (A)(1)(i) for surface coating operations using less than 5 gallons of coating per day.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the number of gallons of each coating employed; and
  - c. the total number of gallons of all the coatings employed.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that emissions unit K001 employed more than the applicable maximum daily coating usage limitation outlined in b(2)a. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

f) Testing Requirements

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

a. Emissions Limitations:

The maximum daily coating usage shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



2. K002, Dip Tank

Operations, Property and/or Equipment Description:

Skate Wheel Dip Tank

- 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)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 21.9 pounds per day from coating only.</p> <p>VOC emissions shall not exceed 4.5 tons per year (TPY) including coatings and cleanup materials.</p> <p>See b)(2)a., b)(2)b., c)(1), and c)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)c.
c.	OAC rule 3745-17-11(C)	Exempt. See b)(2)e.



- (2) Additional Terms and Conditions
  - a. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.7 pounds of VOC per gallon.
  - b. The VOC content of each coating employed in this emissions unit shall not exceed 7.3 pounds per gallon.
  - c. The maximum daily coating usage rate shall not exceed 3 gallons per day.
  - d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content, and coating and cleanup material usage limitations.
  - e. The requirements of OAC rule 3745-17-11(C) are not applicable to this emissions unit pursuant to the rule exemption specified in OAC rule 3745-17-11(A)(1)(h) for surface coating operations that apply only dip coatings.
- c) Operational Restrictions
  - (1) The maximum annual cleanup material usage for this emissions unit shall not exceed 140 gallons.
  - (2) The maximum annual coating usage for this emissions unit shall not exceed 1,095 gallons.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information daily 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. the total number of gallons of all the coatings employed; and
    - e. the total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (b) times (c) for each coating employed].
  - (2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
    - a. the name and identification number of each cleanup material employed;
    - b. the number of gallons of each cleanup material employed;
    - c. the VOC content of each cleanup material, in pounds per gallon; and



d. the total VOC emissions from all coatings and cleanup materials employed, in tons [[i.e., sum of (b) times (c) for each cleanup material employed plus the summation of the daily coating VOC records set forth in d)(1)e.] divided by 2,000 pounds per ton].

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that emissions unit K002 employed more than the applicable maximum daily coating usage limitation outlined in b(2)c. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

f) Testing Requirements

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

VOC emissions shall not exceed 21.9 pounds per day VOC from coating only.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).
  - b. Emissions Limitation:

VOC emissions shall not exceed 4.5 TPY VOC, including cleanup material.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).



c. Emissions Limitations:

The maximum coating usage shall not exceed 3 gallons per day and 1,095 gallons annually.

Applicable Compliance Method:

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

d. Emissions Limitations:

The maximum cleanup material usage shall not exceed 140 gallons annually.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

e. Emissions Limitations:

VOC content of each coating employed in this emissions unit shall not exceed 7.3 pounds per gallon, as applied.

VOC content of each cleanup material employed in this emissions unit shall not exceed 7.7 pounds per gallon.

Applicable Compliance Method:

If required, USEPA Method 24 shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

(1) None.



**3. L001, Batch vapor degreaser**

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

Open-top Batch Vapor 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.	40 CFR Part 63, Subpart T (Alternative Standards)	150 kilograms solvent per square meter / month as a 3-month rolling average. See b)(2)a., b)(2)b., b)(2)c., and c)(1).
b.	OAC rule 3745-21-09(O)	Exempt. See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall ensure the solvent cleaning machine contains only clean liquid solvent on the first day of every month and is filled to the same fill-line. The monthly emissions shall be calculated using the records of all solvent additions, deletions, and recoveries from each month.

b. The permittee shall maintain a log of solvent additions and deletions for the solvent cleaning machine.

c. The permittee shall ensure that the monthly emissions of trichloroethylene from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms per square meter / month.



- d. The requirements of OAC rule 3745-21-09(O)(3) and OAC rule 3745-21-09(O)(5) are not applicable to this emissions unit pursuant to the rule exemption specified in OAC rule 3745-21-09(O)(6)(b) for solvent metal cleaning operations subject to 40 CFR Part 63, Subpart T.
- c) Operational Restrictions
- (1) On the first operating day of every month the permittee shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions 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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following records either in electronic or written form for a period of five years:
    - a. The dates and amounts of trichloroethylene that are added to the solvent cleaning machine.
    - b. The trichloroethylene composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit.
    - c. Calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
  - (2) The permittee shall submit an annual solvent emission report by February 1 of each year, which shall cover the previous calendar year, and shall contain the following information:
    - a. the size and type of the solvent cleaning machine, including if it has a solvent/air interface area or is using cleaning capacity;
    - b. the average monthly solvent consumption for the solvent cleaning machine in kilograms per month; and



- c. the 3-month monthly rolling average HAP emission estimates, calculated each month using the method as described in the standard and/or the "Testing Requirements" section of this permit.
- (3) The permittee shall submit an exceedance report on a semiannual basis. This report shall be submitted no later than January 30th and July 30th of each year and shall cover the previous 6 calendar months ( January-June and July-December). However, if the trichloroethylene three-month rolling average of 150 kilograms/square meter/month is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Southwest Ohio Air Quality Agency (SWOAQA). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) the emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) SWOAQA does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
- a. The reason and a description of the exceedance and action(s) taken to comply with the applicable regulations.
  - b. If no exceedance has occurred, a statement to that effect shall be submitted.
- (4) The permittee shall notify SWOAQA 30 days prior to any change in the type of solvent employed in this emissions unit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
  
Emissions of trichloroethylene shall not exceed 150 kilogram/square meter as a 3-month rolling average.  
  
Applicable Compliance Method:  
  
Using the records of all solvent additions and deletions from the previous month, the permittee shall calculate emissions using the following equation:  
  
$$E_i = (S_{Ai} - LSR_i - SSR_i) / AREA_i$$
  
  
where:  
  
 $E_i$  = the total halogenated HAP solvent emissions from the solvent cleaning



machine during the most recent monthly reporting period  $i$  (kilograms of solvent per square meter of solvent/air interface are per month);

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

$LSR_i$  = the total amount of halogenated HAP liquid solvent removed the solvent cleaning machine during the most recent monthly reporting period  $i$  (kilograms 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  $i$  (kilograms of solvent per month); and  $AREA_i$  = the solvent /air interface area of the solvent cleaning machine (square meters).

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

The permittee shall determine the monthly rolling average,  $EA$ , for the 3-month period ending with the most recent month's reporting period using the following equation:

$$EA_i = (\sum_{j=1}^3 E_j) / 3, \text{ where the summation is from } j=1 \text{ to } j= 3$$

where:

$EA_i$  = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month);

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

$j=1$  = the most recent monthly reporting period;

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

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

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



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

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

Where:

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

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

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

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).

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

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

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI$  = the solvent/air interface area (square meters).

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

- c. Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

g) Miscellaneous Requirements

- (1) None.



**4. L002, In-line vapor degreaser**

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

In-line ConveyORIZED Vapor 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)	Volatile Organic Compound (VOC) emissions shall not exceed 18.3 pounds per hour and 4.88 tons per year (TPY).  See b)(2)a.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
b.	OAC rule 3745-21-09(O)	Exempt. See b)(2)b.
c.	40 CFR Part 63, Subpart T	See b)(2)c, b)(2)d, b)(2)e, b)(2)f, and Sections c)(2) through c)(6).

- (2) Additional Terms and Conditions
  - a. The hourly emission limitation(s) outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.



- b. The requirements of OAC rule 3745-21-09(O)(4) and OAC rule 3745-21-09(O)(5) are not applicable to this emissions unit pursuant to the rule exemption specified in OAC rule 3745-21-09(O)(6)(b) for solvent metal cleaning operations subject to 40 CFR Part 63, Subpart T.
  - c. The in-line solvent cleaning machine shall employ Option 2: Freeboard refrigeration device, freeboard ratio of 1.0, as the chosen control combination selected from Table 3 of 40 CFR 63.463(c). The permittee shall maintain a freeboard ratio of 1.0 or greater.
  - d. The solvent cleaning machine shall employ an idling and downtime mode cover that may be readily opened or closed and that completely covers the cleaning machine openings when in place.
  - e. The downtime mode cover shall be free of cracks, holes, and other defects.
  - f. 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 vapor cleaning machine shall have a primary condenser;
    - iii. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser; and
    - iv. 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 use of cleaning solvent shall not exceed 800 gallons per year.
  - (2) The permittee shall control air disturbances across the solvent cleaning machine by using an idling and downtime mode cover, that shall be in place during the idling and downtime modes, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed.
  - (3) The permittee shall meet the following required work and operational practices:
    - a. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;



- b. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
  - c. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
  - d. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using alternative maintenance practices that have been demonstrated to the satisfaction of the regulating agency (SWOAQA) to achieve the same or better results as those recommended by the manufacturer;
  - e. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container; and
  - f. Sponges, fabric, wood, paper products and/or other porous or absorbent material shall not be cleaned.
  - g. 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).
  - h. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Southwest Ohio Air Quality Agency (SWOAQA).
  - i. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
- (4) 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.
- (5) 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.
- (6) An exceedance has occurred if the requirements of b)(2)c. and b)(2)d. have not been met. An exceedance has occurred if the requirements of b)(2)e. and c)(5) have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to reestablish required parameters. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- d) **Monitoring and/or Recordkeeping Requirements**
- (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.



- (2) The permittee shall measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirement limitation. The date of record shall be included with the recorded measurements.
- (3) The permittee shall conduct a monthly visual inspection of the idling / downtime-mode cover and shall maintain a record of the results. The records shall document that the cover opens only for part entrance and removal, that it completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.
- (4) 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 conduct quarterly monitoring of the hoist speed to determine compliance with term and condition b)(2)d.iv; and
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
- (5) 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 Hazardous Air Pollutant (HAP) solvent content for the 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 of installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, on, or after November 29, 1993, may be substituted.
- (6) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
  - a. The results of the control device monitoring required by d)(1), d)(2), d)(3) and d)(4);
  - b. Information on the actions taken to comply with Section c)(3), including the control equipment, the required monitoring parameters, 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. Estimates of annual solvent consumption for the solvent cleaning machine.



e) Reporting Requirements

- (1) 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 pursuant to 40 CFR Part 63.463(d)(10)]; and
  - b. An estimate of solvent consumption during the reporting period and emissions of each HAP.
  
- (2) The permittee shall submit an exceedance report on a semiannual basis (due January 30 and July 30), unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs pursuant to c)(6). Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from SWOAQA of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:
  - a. The emissions unit (L002) 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 in the terms and conditions of this permit; and
  - c. SWOAQA does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions.
  
- (3) The permittee shall submit quarterly deviation reports if any of the control equipment pursuant to b)(2)f.i. through b)(2)f.iii. is not repaired or replaced within 15 days of any malfunction, and / or the machine is not shut down until repaired. Included in the report shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.
  
- (4) Each exceedance report shall contain the following information:
  - a. The reason and a description of the exceedance and action(s) taken pursuant to c(6) 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
  - b. If no exceedance has occurred, a statement to that effect shall be submitted.



f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 18.3 pounds per hour and 4.88 TPY.

Applicable Compliance Method:

The hourly emissions limitation is based upon the emission unit's potential to emit. Compliance with the annual VOC emissions limitation shall be based upon the record keeping specified in d)(1).

b. Control Requirements:

The permittee has selected and shall employ Option 2: Freeboard refrigeration device, freeboard ration of 1.0, as the control combination required from Table 3 of 40 CFR 63.463(c).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, through compliance with the "Additional Terms and Conditions", "Operational Restrictions", and "Monitoring and Record keeping Requirements" and "Testing Requirements" sections of this permit.

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

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

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

Where:

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

H<sub>i</sub> = hours of operation for solvent cleaning machine i (hours per year).

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



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

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

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

SAl<sub>i</sub> = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

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

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

- c. Sum the PTE<sub>i</sub> for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

g) Miscellaneous Requirements

- (1) None.