State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MONTGOMERY COUNTY
Application No: 08-04199
DATE: 9/6/2000

Mullins Rubber Products Inc
William R Mullins Sr
2949 Valley Street, P.O. Box 31077
Dayton, OH 45437-0077

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

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

cc: **USEPA** **RAPCA** **KY**
IN **Miami Valley Reg Plan Com**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04199

Application Number:	08-04199
APS Premise Number:	0857770747
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Mullins Rubber Products Inc
Person to Contact:	William R Mullins Sr
Address:	2949 Valley Street, P.O. Box 31077 Dayton, OH 45437-0077

Location of proposed air contaminant source(s) [emissions unit(s)]:
2949 Valley St
Dayton, **Ohio**

Description of proposed emissions unit(s):
installation of freeboard chillers to 2 existing vapor degreasers L001 and L002; chapter 31 replacing 08-2975 issued 11-9-94.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic Compounds	8.56

Emissions Unit ID: **L001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
L001 - open top vapor degreaser #1	OAC rule 3745-31-05(A)(3)	0.356 ton/month and 4.28 tons/yr of organic compounds
*** modification**		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart T.
	40 CFR Part 63, Subpart T	Control Combinations Table 2, Option 6 (Freeboard refrigeration device, reduced room draft and freeboard ratio of 1.0)
	OAC rule 3745-21-09(O)(3)	This emissions unit is exempt from the volatile organic compound control measures established in OAC rule 3745-21-09(O) pursuant to OAC rule 3745-21-09(O)(6)(b).

2. Additional Terms and Conditions

2.a * This PTI represents a modification to emissions unit L001 identified in PTI 08-2975 issued 7/31/96. The terms and conditions are being streamlined with an increased allowable, to result in a change from 2.65 tons OC/yr to 4.28 tons OC/yr, for an increase of 1.63 tons OC/yr.

2.b The permittee shall ensure that the chilled air blanket temperature (in ^{o}F), measured at the

center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

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

i. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures outlined in the "Monitoring and/or Record keeping Requirements" section of this permit.

ii. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.

2.d The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

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

i. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements:

ii. Use of reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

iii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.

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

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

vi. The solvent cleaning machine shall have a primary condenser.

B. Operational Restrictions

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

a. Control air disturbances across the solvent cleaning machine opening by incorporating the

following control equipment or techniques:

i. The permittee shall employ a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

b. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

d. Parts shall be 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 Director (appropriate field Office or local air agency).

e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

i. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (appropriate field Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (appropriate

field Office or local air agency).

k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

l. Sponges, fabric, wood, and paper products shall not be cleaned.

3. The maximum annual solvent usage for this emissions unit shall not exceed 705 gallons. Solvent usage = solvent added (gallons) - solvent in waste disposed (gallons)

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

a. The identification of the degreasing solvent employed.

b. The number of gallons of degreasing solvent used.

c. The number of gallons of degreasing solvent disposed of as waste.

d. The monthly VOC emission rate, see section E.1.a for calculation method.

2. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

3. The permittee shall conduct quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:

a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:

i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.

ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.

iii. Record the reading for each corner.

iv. Average the values obtained at each corner and record the average wind speed.

b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

4. The permittee shall monitor the hoist speed as described below:

a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District office or local air agency) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

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. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

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 control device monitoring required in this section of the permit.

b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

c. Estimates of annual trichloroethylene consumption for the solvent cleaning machine.

D. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10)."

b. An estimate of solvent consumption during the reporting period.

2. The permittee shall submit an exceedance report on a semiannual basis.

a. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection.

b. If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection.

3. 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 Director (appropriate District Office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each

exceedance report shall contain the following:

a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels, and

b. if no exceedance has occurred, a statement to that effect shall be submitted.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -
0.356 ton/month organic compounds

Applicable Compliance Method -
To determine the actual organic compound emission rate, the following equation shall be used:

E = (Ls - Lw) x D/2000

E = organic compound emission rate (ton/month)

Ls = liquid volume of trichloroethylene solvent employed each month (gallons)

Lw = liquid volume of trichloroethylene solvent sent off-site as waste (gallons)

D = density of trichloroethylene solvent (pounds/gallon)

b. Emission Limitation -
4.28 tons/yr organic compounds

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in Section C.1. and shall be the sum of the monthly VOC emission rates for the calendar year.

F. Miscellaneous Requirements

none

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
L002 - open top vapor degreaser #1 *** modification**	OAC rule 3745-31-05(A)(3)	0.356 ton/month and 4.28 tons/yr of organic compounds The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart T.
	40 CFR Part 63, Subpart T	Control Combinations Table 2, Option 6 (Freeboard refrigeration device, reduced room draft and freeboard ratio of 1.0)
	OAC rule 3745-21-09(O)(3)	This emissions unit is exempt from the volatile organic compound control measures established in OAC rule 3745-21-09(O) pursuant to OAC rule 3745-21-09(O)(6)(b).

2. Additional Terms and Conditions

2.a * This PTI represents a modification to emissions unit L002 identified in PTI 08-2975 issued 7/31/96. The terms and conditions are being streamlined with an increased allowable, to result in a change from 2.65 tons OC/yr to 4.28 tons OC/yr, for an increase of 1.63 tons OC/yr.

2.b The permittee shall ensure that the chilled air blanket temperature (in ^{o}F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

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

i. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures outlined in the "Monitoring and/or Record keeping Requirements" section of this permit.

ii. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.

2.d The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

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

i. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements:

ii. Use of reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

iii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.

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

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

vi. The solvent cleaning machine shall have a primary condenser.

B. Operational Restrictions

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

a. Control air disturbances across the solvent cleaning machine opening by incorporating the following control equipment or techniques:

i. The permittee shall employ a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

b. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

d. Parts shall be 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 Director (appropriate field Office or local air agency).

e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be

transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

i. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (appropriate field Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (appropriate field Office or local air agency).

k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

l. Sponges, fabric, wood, and paper products shall not be cleaned.

3. The maximum annual solvent usage for this emissions unit shall not exceed 705 gallons. Solvent usage = solvent added (gallons) - solvent in waste disposed (gallons)

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

a. The identification of the degreasing solvent employed.

b. The number of gallons of degreasing solvent used.

c. The number of gallons of degreasing solvent disposed of as waste.

d. The monthly VOC emission rate, see section E.1.a for calculation method.

2. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

3. The permittee shall conduct quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:

a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent

cleaning machine as follows:

i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.

ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.

iii. Record the reading for each corner.

iv. Average the values obtained at each corner and record the average wind speed.

b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

4. The permittee shall monitor the hoist speed as described below:

a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District office or local air agency) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

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. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

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 control device monitoring required in this section of the permit.

b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

c. Estimates of annual trichloroethylene consumption for the solvent cleaning machine.

D. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10)."

b. An estimate of solvent consumption during the reporting period.

2. The permittee shall submit an exceedance report on a semiannual basis.

a. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection.

b. If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection.

3. 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 Director (appropriate District Office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels, and

b. if no exceedance has occurred, a statement to that effect shall be submitted.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -
0.356 ton/month organic compounds

Applicable Compliance Method -
To determine the actual organic compound emission rate, the following equation shall be used:

$E = (Ls - Lw) \times D/2000$

E = organic compound emission rate (ton/month)

Ls = liquid volume of trichloroethylene solvent employed each month (gallons)

Lw = liquid volume of trichloroethylene solvent sent off-site as waste (gallons)

D = density of trichloroethylene solvent (pounds/gallon)

b. Emission Limitation -

4.28 tons/yr organic compounds

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in Section C.1. and shall be the sum of the monthly VOC emission rates for the calendar year.

F. Miscellaneous Requirements

none

NEW SOURCE REVIEW FORM B

PTI Number: 08-04199 Facility ID: 0857770747

FACILITY NAME Mullins Rubber Products Inc

FACILITY DESCRIPTION installation of freeboard chillers to 2 CITY/TWP Dayton

Emissions Unit ID: **L002**

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID L001

EMISSIONS UNIT DESCRIPTION open top vapor degreaser #1

DATE INSTALLED 1992

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment			0.356 ton/month	4.28
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR Part 63 Subpart T PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the applicable rules and allowable emissions limit, 40 CFR Part 63 Subpart T through the control combinations of freeboard refrigeration device, freeboard ratio of 1.0 and reduced room draft, monitoring, reporting and record keeping requirements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

10781.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 08-04199 Facility ID: 0857770747

FACILITY NAME Mullins Rubber Products Inc

FACILITY DESCRIPTION installation of freeboard chillers to 2 CITY/TWP Dayton

Emissions Unit ID: **L002**

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID L002

EMISSIONS UNIT DESCRIPTION open top vapor degreaser #2

DATE INSTALLED 1992

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment			0.356 ton/month	4.28
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR Part 63 Subpart T PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the applicable rules and allowable emissions limit, 40 CFR Part 63 Subpart T through the control combinations of freeboard refrigeration device, freeboard ratio of 1.0 and reduced room draft, monitoring, reporting and record keeping requirements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 08-04199 Facility ID: 0857770747

FACILITY NAME Mullins Rubber Products Inc

FACILITY DESCRIPTION installation of freeboard chillers to 2 CITY/TWP Dayton

Emissions Unit ID: **L002**

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0000000c.wpd	☐	
Modeling form/results	☐	0000000s.wpd	☐	☐
PTI Application (complete or partial)*	☐	0000000a.wpd	☐	☐
BAT Study	☐	0000000b.wpd	☐	☐
Other/misc.	☐	0000000t.wpd	☐	☐

*** Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.**

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Mullins Rubber Products, Inc. is applying for a Chapter 31 modification for two identical open top vapor degreasers L001 and L002. The two open top vapor degreasers are used to degrease all metals parts after the parts have been fabricated and machined. The degreasers were permitted under PTI 08-2975 with an annual allowable emissions rate of 2.65 tons OC/yr each. The permittee would like an increase allowable emissions rate due to projected production increases over the next five years. The vapor degreasers are in compliance with the MACT standard for Halogenated Solvent Cleaning 40 CFR Part 63 Subpart T through the use of one of the necessary control combinations (Table 2. Option 6) for batch vapor solvent cleaning machines with a solvent/air interface area greater than 1.21 square meters (13 square feet). The following control combinations will be used by the permittee freeboard ratio of 1.0, freeboard refrigeration device and reduced room draft. The solvent used by the permittee in L001 and L002 is trichloroethylene. The allowable emissions is based upon a maximum annual solvent usage limit of 705 gallons for each open top vapor degreaser, solvent usage is defined as solvent added minus solvent in waste disposed.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

NEW SOURCE REVIEW FORM B

PTI Number: 08-04199 Facility ID: 0857770747

FACILITY NAME Mullins Rubber Products Inc

FACILITY DESCRIPTION installation of freeboard chillers to 2 CITY/TWP Dayton

Emissions Unit ID: **L002**

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic Compounds	8.56