



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/07/97

CERTIFIED MAIL

03-32-01-0060

RE: Final Chapter 3745-35 Permit To Operate

Spectrulite Consortium, Inc.
Roger Riemann
1001 College Street
P.O. Box 258
Madison, IL 62060-0258

Dear Roger Riemann

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Northwest District Office at (419) 352-8461

Very truly yours,


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

cc: Northwest District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 08/07/97

Facility ID: 03-32-01-0060

Expiration Date: 08/07/00

FINAL ISSUE

This document constitutes issuance for: Spectrulite Consortium, Inc.
115 Stanford Parkway
Findlay, OH 45840

of a permit to operate for:

L001 (Open Top Vapor Degreaser)
Open Top Vapor Unit Similar to Vapor Degreaser With RACT Controls

PART I General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

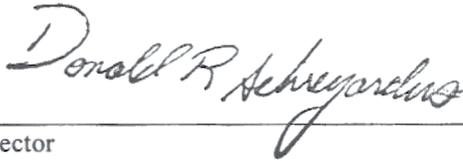
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script that reads "Donald R. Scheyardus". The signature is written in black ink and is positioned above a horizontal line.

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Open Top Vapor Degreaser (Plate Processor #1) with refrigerated chiller	PTI # 03-3645 3745-21-09 (O)(3) 3745-35-07 40 CFR part 63, subpart T	See Additional Terms and Conditions

2. Additional Terms and Conditions

- 2.a The combined annual emissions of volatile organic compounds (VOC) from emissions units L001, L002, and L003 shall not exceed 7.0 tons per rolling 12-month period. (This equates to 1158 gallons of trichloroethylene at a density of 12.1 lbs/gal.) To ensure federal enforceability for the first 12 months of operation after the issuance of this permit, the permittee shall not exceed the following combined usage rates for emissions units L001, L002 and L003:

Month 1	180 gallons trichloroethylene
Months 1-2	270 gallons trichloroethylene
Months 1-3	357 gallons trichloroethylene
Months 1-4	447 gallons trichloroethylene
Months 1-5	534 gallons trichloroethylene
Months 1-6	624 gallons trichloroethylene
Months 1-7	711 gallons trichloroethylene
Months 1-8	801 gallons trichloroethylene
Months 1-9	888 gallons trichloroethylene
Months 1-10	978 gallons trichloroethylene
Months 1-11	1065 gallons trichloroethylene
Months 1-12	1158 gallons trichloroethylene

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual limitation shall be based upon a rolling 12-month summation of the VOC emissions.

- 2.b The open top vapor degreaser shall employ a cover and safety switches as described below:

- i. A cover that can be opened and closed easily without disturbing the vapor zone.
- ii. A condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
- iii. A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle.
- iv. A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high.
- v. A water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

- 2.c The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser

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Facility Name: Spectrullite Consortium, Inc.
Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L001)

B. Operational Restrictions

1. This permit allows for the use of the cleaning solvent specified by the permittee in PTI number 03-3645. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the trichloroethylene emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on cleaning solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground level concentration to the maximum acceptable ground level concentration (MAGLC). The following table summarizes the results of the modeling for this pollutant:

Pollutant: trichloroethylene

TLV (microgram/cubic meter): 269000

Maximum Hourly Emission Rate (lbs/hr): 6.72

Predicted 1 Hour Maximum Ground Level Concentration at the Fenceline (microgram/cubic meter): 3344

(MAGLC) (microgram/cubic meter): 6404

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office is required, including the possible issuance of modifications to PTI number 03-3645 and the operating permit:

- a. Any change in the composition of the cleaning solvent, or the use of new cleaning solvent, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the TLV value specified above.
 - b. A reduction in the TLV by the ACGIH of the cleaning solvent that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC.
 - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
 - d. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of the MAGLC specified above.
 - e. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - f. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).
2. The permittee shall operate and maintain the open top vapor degreaser in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Keep the cover closed at all times except when processing work loads through the degreaser.
 - b. Minimize solvent carry-out by:
 - i. Racking parts so that solvent drains freely and is not trapped.
 - ii. Moving parts in and out of the degreaser at less than 11 feet per minute.
 - iii. Holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer.
 - iv. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone.
 - v. Allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
 - c. Clean only materials that are neither porous nor absorbent.
 - d. Occupy no more than one-half of the degreaser's open-top area with a workload.
 - e. Always spray within the vapor level.

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Facility Name: Spectrulite Consortium, Inc.

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Facility ID: 03-32-01-0060

Emissions Unit: Open Top Vapor Degreaser (L001)

B. Operational Restrictions (continued)

- f. Repair solvent leaks immediately, or shut down the degreaser.
- g. Store waste solvent only in covered containers.
- h. Operate the cleaner such that water cannot be visually detected in solvent exiting the water separator.
Use no ventilation fans near the degreaser opening.
- j. When the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip.
- k. If a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
- l. Provide a permanent, conspicuous label, summarizing the operating procedures.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of all control equipment maintenance performed on emissions unit L001.
- 2. The permittee shall maintain the following monthly records for the combined solvent usage in emissions units L001, L002, and L003:
 - a. The total number of gallons of solvent employed.
 - b. The number of gallons of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation.
 - c. The combined solvent usage rate for the month [(2.a) - (2.b)], in gallons.
 - d. The total monthly VOC emission rate, in pounds [(2.c) x (solvent density)].
 - e. Beginning the first month following the first 12 calendar months of operation under this permit, the total amount of VOC emitted in tons per rolling 12-month period.
 - f. During the first 12 calendar months of operation under this permit, the total cumulative monthly solvent usage, in gallons.
 - g. The company identification of the solvent.

D. Reporting Requirements

- 1. The permittee shall submit annual reports of the total solvent usage (gallons) and the total VOC emissions (tons). The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit quarterly reports which identify any exceedances of the monthly cumulative total solvent usage values specified in A.2.a above, the rolling 12-month solvent usage limit of 1158 gallons, and the rolling 12-month limit VOC emission limit of 7.0 tons/year, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

None

F. Miscellaneous Requirements

- 1. The following Terms and Conditions have been incorporated into this permit to establish federally enforceable limitations on potential to emit from emissions units L001, L002 and L003, pursuant to OAC rule 3745-35-07: A.2.a, C.2, D, and F.

4 Facility Name: Spectrulite Consortium, Inc.
4 Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L001)

F. Miscellaneous Requirements (continued)

2. The permittee shall achieve compliance with the MACT standards (40 CFR part 63, subpart T) for halogenated HAP solvent cleaning machines for this emissions unit by no later than December 2, 1997. By December 2, 1997, the permittee shall submit a report that (a) describes the control measures that will be employed to comply with the MACT standards and (b) provides the date of implementation and/or installation for the control measures.
3. The permittee shall submit a Title V permit application for the facility by no later than March 14, 1999. The permittee shall obtain a Title V permit by no later than September 4, 2000.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date **8/7/97**

Facility ID: 03-32-01-0060

Expiration Date: 08/07/00

FINAL ISSUE

This document constitutes issuance for: **Spectrulite Consortium, Inc**
115 Stanford Parkway
Findlay, OH 45840

of a permit to operate for:

L002 (Open Top Vapor Degreaser)
Open Top Vapor Unit Similar to Vapor Degreaser With RACT Controls

PART I General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

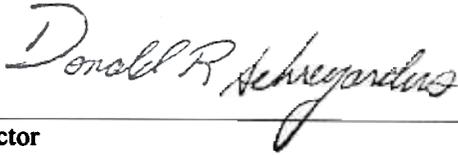
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Open Top Vapor Degreaser (Plate Processor #2) with refrigerated chiller	PTI # 03-3645 3745-21-09 (O)(3) 3745-35-07 40 CFR part 63, subpart T	See Additional Terms and Conditions

2. Additional Terms and Conditions

- 2.a The combined annual emissions of volatile organic compounds (VOC) from emissions units L001, L002, and L003 shall not exceed 7.0 tons per rolling 12-month period. (This equates to 1158 gallons of trichloroethylene at a density of 12.1 lbs/gal.) To ensure federal enforceability for the first 12 months of operation after the issuance of this permit, the permittee shall not exceed the following combined usage rates for emissions units L001, L002 and L003:

Month 1	180 gallons trichloroethylene
Months 1-2	270 gallons trichloroethylene
Months 1-3	357 gallons trichloroethylene
Months 1-4	447 gallons trichloroethylene
Months 1-5	534 gallons trichloroethylene
Months 1-6	624 gallons trichloroethylene
Months 1-7	711 gallons trichloroethylene
Months 1-8	801 gallons trichloroethylene
Months 1-9	888 gallons trichloroethylene
Months 1-10	978 gallons trichloroethylene
Months 1-11	1065 gallons trichloroethylene
Months 1-12	1158 gallons trichloroethylene

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual limitation shall be based upon a rolling 12-month summation of the VOC emissions.

- 2.b The open top vapor degreaser shall employ a cover and safety switches as described below:
- i. A cover that can be opened and closed easily without disturbing the vapor zone.
 - ii. A condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
 - iii. A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle.
 - iv. A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high.
 - v. A water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.
- 2.c The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser.

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Facility Name: Spectrulite Consortium, Inc.

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Facility ID: 03-32-01-0060

Emissions Unit: Open Top Vapor Degreaser (L002)

B. Operational Restrictions

1. This permit allows for the use of the cleaning solvent specified by the permittee in PTI number 03-3645. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the trichloroethylene emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on cleaning solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground level concentration to the maximum acceptable ground level concentration (MAGLC). The following table summarizes the results of the modeling for this pollutant:

Pollutant: trichloroethylene

TLV (microgram/cubic meter): 269000

Maximum Hourly Emission Rate (lbs/hr): 6.72

Predicted 1 Hour Maximum Ground Level Concentration at the Fenceline (microgram/cubic meter): 3344

(MAGLC) (microgram/cubic meter): 6404

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office is required, including the possible issuance of modifications to PTI number 03-3645 and the operating permit:

- a. Any change in the composition of the cleaning solvent, or the use of new cleaning solvent, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the TLV value specified above.
 - b. A reduction in the TLV by the ACGIH of the cleaning solvent that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC.
 - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
 - d. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of the MAGLC specified above.
 - e. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - f. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).
2. The permittee shall operate and maintain the open top vapor degreaser in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Keep the cover closed at all times except when processing work loads through the degreaser.
 - b. Minimize solvent carry-out by:
 - i. Racking parts so that solvent drains freely and is not trapped.
 - ii. Moving parts in and out of the degreaser at less than 11 feet per minute.
 - iii. Holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer.
 - iv. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone.
 - v. Allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
 - c. Clean only materials that are neither porous nor absorbent.
 - d. Occupy no more than one-half of the degreaser's open-top area with a workload.
 - e. Always spray within the vapor level.

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Facility Name: Spectrulite Consortium, Inc.

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Facility ID: 03-32-01-0060

Emissions Unit: Open Top Vapor Degreaser (L002)

B. Operational Restrictions (continued)

- f. Repair solvent leaks immediately, or shut down the degreaser.
- g. Store waste solvent only in covered containers.
- h. Operate the cleaner such that water cannot be visually detected in solvent exiting the water separator.
Use no ventilation fans near the degreaser opening.
- j. When the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip.
- k. If a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
- l. Provide a permanent, conspicuous label, summarizing the operating procedures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of all control equipment maintenance performed on emissions unit L002.
2. The permittee shall maintain the following monthly records for the combined solvent usage in emissions units L001, L002, and L003:
 - a. The total number of gallons of solvent employed.
 - b. The number of gallons of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation.
 - c. The combined solvent usage rate for the month [(2.a) - (2.b)], in gallons.
 - d. The total monthly VOC emission rate, in pounds [(2.c) x (solvent density)].
 - e. Beginning the first month following the first 12 calendar months of operation under this permit, the total amount of VOC emitted in tons per rolling 12-month period.
 - f. During the first 12 calendar months of operation under this permit, the total cumulative monthly solvent usage, in gallons.
 - g. The company identification of the solvent.

D. Reporting Requirements

1. The permittee shall submit annual reports of the total solvent usage (gallons) and the total VOC emissions (tons). The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly reports which identify any exceedances of the monthly cumulative total solvent usage values specified in A.2.a above, the rolling 12-month solvent usage limit of 1158 gallons, and the rolling 12-month limit VOC emission limit of 7.0 tons/year, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

None

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit to establish federally enforceable limitations on potential to emit from emissions units L001, L002 and L003, pursuant to OAC rule 3745-35-07: A.2.a, C.2, D, and F.

4 Facility Name: Spectrullite Consortium, Inc.
4 Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L002)

F. Miscellaneous Requirements (continued)

2. The permittee shall achieve compliance with the MACT standards (40 CFR part 63, subpart T) for halogenated HAP solvent cleaning machines for this emissions unit by no later than December 2, 1997. By December 2, 1997, the permittee shall submit a report that (a) describes the control measures that will be employed to comply with the MACT standards and (b) provides the date of implementation and/or installation for the control measures.
3. The permittee shall submit a Title V permit application for the facility by no later than March 14, 1999. The permittee shall obtain a Title V permit by no later than September 4, 2000.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: **8/7/97**

Facility ID: 03-32-01-0060

Expiration Date: 08/07/00

FINAL ISSUE

This document constitutes issuance for: Spectrulite Consortium, Inc.
115 Stanford Parkway
Findlay, OH 45840

of a permit to operate for:

L003 (Open Top Vapor Degreaser)
Open Top Vapor Unit Similar to Vapor Degreaser With RACT Controls

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

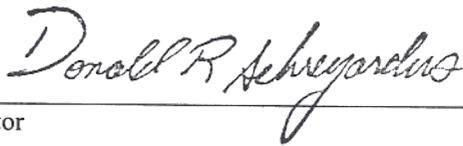
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Open Top Vapor Degreaser (Plate Processor #3) with refrigerated chiller	PTI # 03-3645 3745-21-09 (O)(3) 3745-35-07 40 CFR part 63, subpart T	See Additional Terms and Conditions

2. Additional Terms and Conditions

- 2.a The combined annual emissions of volatile organic compounds (VOC) from emissions units L001, L002, and L003 shall not exceed 7.0 tons per rolling 12-month period. (This equates to 1158 gallons of trichloroethylene at a density of 12.1 lbs/gal.) To ensure federal enforceability for the first 12 months of operation after the issuance of this permit, the permittee shall not exceed the following combined usage rates for emissions units L001, L002 and L003:

Month 1	180 gallons trichloroethylene
Months 1-2	270 gallons trichloroethylene
Months 1-3	357 gallons trichloroethylene
Months 1-4	447 gallons trichloroethylene
Months 1-5	534 gallons trichloroethylene
Months 1-6	624 gallons trichloroethylene
Months 1-7	711 gallons trichloroethylene
Months 1-8	801 gallons trichloroethylene
Months 1-9	888 gallons trichloroethylene
Months 1-10	978 gallons trichloroethylene
Months 1-11	1065 gallons trichloroethylene
Months 1-12	1158 gallons trichloroethylene

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual limitation shall be based upon a rolling 12-month summation of the VOC emissions.

- 2.b The open top vapor degreaser shall employ a cover and safety switches as described below:

- i. A cover that can be opened and closed easily without disturbing the vapor zone.
- ii. A condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
- iii. A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle.
- iv. A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high.
- v. A water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

- 2.c The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser.

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Facility Name: Spectrulite Consortium, Inc.
Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L003)

B. Operational Restrictions

1. This permit allows for the use of the cleaning solvent specified by the permittee in PTI number 03-3645. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the trichloroethylene emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on cleaning solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground level concentration to the maximum acceptable ground level concentration (MAGLC). The following table summarizes the results of the modeling for this pollutant:

Pollutant: trichloroethylene

TLV (microgram/cubic meter): 269000

Maximum Hourly Emission Rate (lbs/hr): 6.72

Predicted 1 Hour Maximum Ground Level Concentration at the Fenceline (microgram/cubic meter): 3344

(MAGLC) (microgram/cubic meter): 6404

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office is required, including the possible issuance of modifications to PTI number 03-3645 and the operating permit:

- a. Any change in the composition of the cleaning solvent, or the use of new cleaning solvent, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the TLV value specified above.
 - b. A reduction in the TLV by the ACGIH of the cleaning solvent that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC.
 - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
 - d. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of the MAGLC specified above.
 - e. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - f. Any change in the composition of the cleaning solvent, or use of new cleaning solvent, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).
2. The permittee shall operate and maintain the open top vapor degreaser in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Keep the cover closed at all times except when processing work loads through the degreaser.
 - b. Minimize solvent carry-out by
 - i. Racking parts so that solvent drains freely and is not trapped.
 - ii. Moving parts in and out of the degreaser at less than 11 feet per minute.
 - iii. Holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer
 - iv. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone.
 - v. Allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
 - c. Clean only materials that are neither porous nor absorbent.
 - d. Occupy no more than one-half of the degreaser's open-top area with a workload.
 - e. Always spray within the vapor level.

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Facility Name: Spectrulite Consortium, Inc.
Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L003)

B. Operational Restrictions (continued)

- f. Repair solvent leaks immediately, or shut down the degreaser.
- g. Store waste solvent only in covered containers.
- h. Operate the cleaner such that water cannot be visually detected in solvent exiting the water separator.
- i. Use no ventilation fans near the degreaser opening.
- j. When the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip.
- k. If a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
- l. Provide a permanent, conspicuous label, summarizing the operating procedures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of all control equipment maintenance performed on emissions unit L003.
2. The permittee shall maintain the following monthly records for the combined solvent usage in emissions units L001, L002, and L003:
 - a. The total number of gallons of solvent employed.
 - b. The number of gallons of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation.
 - c. The combined solvent usage rate for the month [(2.a) - (2.b)], in gallons.
 - d. The total monthly VOC emission rate, in pounds [(2.c) x (solvent density)].
 - e. Beginning the first month following the first 12 calendar months of operation under this permit, the total amount of VOC emitted in tons per rolling 12-month period.
 - f. During the first 12 calendar months of operation under this permit, the total cumulative monthly solvent usage, in gallons.
 - g. The company identification of the solvent.

D. Reporting Requirements

1. The permittee shall submit annual reports of the total solvent usage (gallons) and the total VOC emissions (tons). The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly reports which identify any exceedances of the monthly cumulative total solvent usage values specified in A.2.a above, the rolling 12-month solvent usage limit of 1158 gallons, and the rolling 12-month limit VOC emission limit of 7.0 tons/year, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

None

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit to establish federally enforceable limitations on potential to emit from emissions units L001, L002 and L003, pursuant to OAC rule 3745-35-07: A.2.a, C.2, D, and F.

4 Facility Name: Spectrullite Consortium, Inc.
4 Facility ID: 03-32-01-0060
Emissions Unit: Open Top Vapor Degreaser (L003)

F. Miscellaneous Requirements (continued)

2. The permittee shall achieve compliance with the MACT standards (40 CFR part 63, subpart T) for halogenated HAP solvent cleaning machines for this emissions unit by no later than December 2, 1997. By December 2, 1997, the permittee shall submit a report that (a) describes the control measures that will be employed to comply with the MACT standards and (b) provides the date of implementation and/or installation for the control measures.
3. The permittee shall submit a Title V permit application for the facility by no later than March 14, 1999. The permittee shall obtain a Title V permit by no later than September 4, 2000.