



State of Ohio Environmental Protection Agency

Street Address:	Mailing Address:
1800 WaterMark Drive Columbus, OH 43215-1099	P.O. Box 1049 Columbus, OH 43216-1049

07/02/98

CERTIFIED MAIL

13-18-53-7766

RE: Final Chapter 3745-35 Permit To Operate

Snow Metal Products
Forest E. Wandel
6060 Cochran Rd.
Solon, OH 44139-3392

Dear Forest E. Wandel:

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 Cleveland Division of Air Pollution Control at (216) 664-2324.

Very truly yours,

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

cc: Cleveland Division of Air Pollution Control
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 07/02/98

Facility ID: 13-18-53-7766

Expiration Date: 07/02/03

FINAL ISSUE

This document constitutes issuance for:

Snow Metal Products
6060 Cochran
Solon, OH 44139-3392

of a permit to operate for:

K001 (L-3)
Trichloroethylene Wax coating dip tank

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.

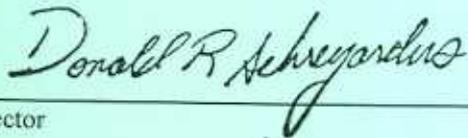
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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 Cleveland Division of Air Pollution Control.

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. Schreyer". The signature is written in black ink and is positioned above a horizontal line.

Director

II: Special Terms and Conditions

Applicable Emissions Limitations and/or Control Requirements

- 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
L-3, using trichloroethylene, wax coating dip tank for coating stainless steel, brass components, and misc. metal parts	OAC 3745-31-05 PTI 13-3031	The dip tank shall be equipped with a cover and a condensing coil, and shall have a freeboard ratio no less than 1.3.
	OAC 3745-21-09 (U) (1)	See A.2.a.

2. Additional Terms and Conditions

- This emissions unit is exempt from the limitation in OAC-3745-21-09(U)(1) pursuant to OAC 3745-21-09(U)(2)(e)(ii), since the emissions unit never uses more than ten (10) gallons per day of coatings for miscellaneous metal parts.

B. Operational Restrictions

- The emissions unit shall not be allowed to employ more than 10 gallons of makeup trichloroethylene (TCE) per day, and 9.5 tons of TCE per year as a rolling 365-day summation. The TCE used to remake the TCE removed in the cleanout solution is not part of this restriction.
- Each time TCE is added, the amount shall be measured and entered on a log sheet.
- If the additions for the last 365 days total more than 8 tons, the Regulated Materials Coordinator shall be notified so that the additions will be monitored by the Regulated Materials Coordinator until the 365-day total is below 8 tons.
- If the 365-day rolling total exceeds 9.25 tons, the Regulated Materials Coordinator must approve further additions.
- If the 9.5 tons per year limit would be exceeded by an addition of TCE, the addition shall not be made.
- All associates working on the process must receive training on the restrictions in this permit. Only designated associates will be allowed to make additions to the process.

C. Monitoring and/or Record Keeping Requirements

- The solution in the process is cleaned out and replaced several times a year. The cleanout waste solution that is removed contains a percentage of TCE. The amount of TCE in the waste will not be counted toward the total emissions.

Monitoring and/or Record Keeping Requirements (continued)

2. A daily log shall be kept of the daily TCE additions and cleanout credits. The log shall contain at least the following information:
 - a. day of month;
 - b. total pounds added;
 - c. total gallons added;
 - d. rolling 365-day total use, in tons (this shall include the remakes and the makeups);
 - e. rolling 365-day total emissions, in tons;
 - f. waste credit; and
 - g. signature/initials of the person making the entry.
3. The 365-day rolling total emissions shall be calculated using the following equation:
$$\text{365-day rolling total} = \text{total additions for the last 365 days} - \text{amount of TCE in cleanout waste removed during the previous 365 days.}$$
4. Procedure for determining the weight of TCE in cleanouts:
 - a. The weight of the waste shall be determined by weighing the drums.
 - b. The waste shall be tested by the disposal facility or an outside lab to determine the percentage of TCE in the waste. The test shall be done soon after the cleanout.
 - c. The amount of TCE shipped in the waste shall be determined (weight of waste shipped x percent TCE in the waste).
 - d. The amount of TCE added to the system to refill it shall be specified in the additions log when the system is refilled.
 - e. The amount of TCE shipped in the waste shall be specified in the additions log.
 - f. A cleanout log shall be kept with the following information:
 - i. the date of the cleanout;
 - ii. the weight of the waste removed from the process;
 - iii. the percent of TCE in the waste;
 - iv. the name of the lab testing the waste;
 - v. the weight of TCE in the waste; and
 - vi. the name or initials of the person making the entry.
5. A log shall be kept of the daily coating usage. The log shall contain at least the following information for this coating operation:
 - a. the identification for each coating material employed; and
 - b. the total number of gallons of coating materials employed.

Note: Volume of coating used = Volume of TCE + Volume of solid wax.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit (10 gallons per day), the maximum daily TCE usage limit (10 gallons per day), and/or the rolling 365-day TCE emission limit of 9.5 tons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 15 of each year.

Facility Name: Snow Metal Products

Facility ID: 13-18-53-7766

Emissions Unit: L-3 (K001)

Testing Requirements

None

Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A - F.