State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
CUYAHOGA COUNTY

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

Application No: 13-04323

DATE: 6/1/2004

Goodrich Landing Gear Plating Operations
Tom Wolf
2800 East 33rd Street
Cleveland, OH 44115

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 **$200** 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,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CLAA** **PA**

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04323** FOR AN AIR CONTAMINANT SOURCE FOR
GOODRICH LANDING GEAR PLATING OPERATIONS

On 6/1/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Goodrich Landing Gear Plating Operations**, located at **2800 East 33rd Street, Cleveland**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04323:

Open top vapor degreaser using trichloroethylene -- L003.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]

DRAFT PERMIT TO INSTALL 13-04323

Application Number:	13-04323
APS Premise Number:	1318005949
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Goodrich Landing Gear Plating Operations
Person to Contact:	Tom Wolf
Address:	2800 East 33rd Street Cleveland, OH 44115

Location of proposed air contaminant source(s) [emissions unit(s)]:
2800 East 33rd Street
Cleveland, Ohio

Description of proposed emissions unit(s):
Open top vapor degreaser using trichloroethylene -- L003.

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

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally

Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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
OC	14.2

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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
L003 - Open top batch vapor degreaser using trichloroethylene with a solvent/air interface of 72 square feet, maintaining the idling emission limit control option to demonstrate compliance.	OAC rule 3475-31-05 (A)(3)	14.2 tons per year OC The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
	OAC rule 3745-21-09 (O)	In accordance with paragraph (O)(6)(b)of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(2) - (O)(5) shall not apply to this emissions unit. See section A.I.2.f.
	40 CFR Part 63, Subpart T	See additional terms and conditions below.

2. Additional Terms and Conditions

2.a The permittee shall perform the following activities:

i. Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and to establish parameters that will be monitored to demonstrate compliance.

ii. Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

iii. Operate the solvent cleaning machine within the parameters identified in the initial performance test.

2.b 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:

(a) Use of an idling and downtime mode cover that shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance for monitoring is being performed that requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes and other defects.

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

iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

iv. 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.

2.c The permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilogram per hour per square meter (0.045 pound per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.

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

i. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

ii. Ensure that the idling-mode cover is maintained free of cracks, holes, and other

defects

2.e The permittee shall operate the solvent cleaning machine within the monitoring parameters measured during the idling emission rate test:

i. the temperature of the primary condenser coil shall be - 5 degrees Fahrenheit or less; and

ii. the windspeed across the top of the freeboard area of the solvent cleaning machine shall not be greater than zero (0) feet/minute.

In accordance with 40 CFR 63.468(d)(6)(iv)(B), the results of the idling emission rate test shall be used to demonstrate compliance with the idling emission limit.

2.f This rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The US EPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of US EPA approval of the rule citation as a revision to the Ohio SIP for VOC.

II. 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(s) by incorporating the following control equipment or techniques:

Cover(s) for the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

b. The parts baskets or the parts being cleaned in the 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 Cleveland Division of Air Quality (Cleveland DAQ).

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 or the 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 Cleveland DAQ 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 A to Subpart T if requested during an inspection by the Cleveland DAQ.

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.

III. Monitor1ing and/or Recordkeeping Requirements

1. 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.

If the permittee can demonstrate to the satisfaction of the Cleveland DAQ 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.

2. The permittee shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test. These records shall be maintained for the lifetime of the solvent cleaning machine.

3. 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 of the primary condenser coil during the idling mode.

4. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, 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 in the enclosure by slowly rotating a velometer or similar device inside the entrance to the enclosure until the maximum speed is located.

      ii. Record the maximum 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.

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.

   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.

IV. Reporting Requirements

1. The permittee shall submit an initial statement of compliance no later than 150 days after startup. Each initial statement of compliance shall contain the following:

   a. The name and address of the permittee.

   b. The address (i.e., physical location) of the solvent cleaning machine.

   c. A list of the control equipment used to achieve compliance.

   d. A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.

2. 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.

3. The permittee shall submit an exceedance report on a semiannual basis. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If the temperature of the primary condenser coil exceeds - 5 degrees Fahrenheit, and no correction was made within 15 days of detection, or if operating conditions were established under which the wind speed exceeded zero (0) feet/minute and no correction was made within 15 days of detection, or if the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection 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 Cleveland DAQ. 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 Cleveland DAQ 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 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.

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

4. The permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of 40 CFR Part 63, Appendix A. This report shall comply with the following requirements:

a. The test must be conducted on the same specific model solvent cleaning machine used at the facility. The test can be done by the permittee of the affected machine or can be supplied by the vendor of that solvent cleaning machine or a third party. If a solvent cleaning machine vendor or a third party test report is used to demonstrate compliance, the following requirements shall be met:

i. The report shall include the following for the solvent cleaning machine tested: name of person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.

ii. The permittee shall comply with the following requirements:

(a) Submit a statement by the solvent cleaning machine vendor that the unit tested is the same as the unit the report is being submitted for.

(b) Demonstrate to the satisfaction of the Cleveland DAQ that the trichloroethylene emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the trichloroethylene emissions from the solvent cleaning machine n the vendor test report.

b. The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.

V. Testing Requirements

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

   a. Emission Limitation

   an idling emission limit of 0.22 kilogram OC per hour per square meter (0.045 pound OC per hour per square foot) of solvent/air interface area.

   Applicable Compliance Method

   The permittee shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in 40 CFR Part 63, Appendix A, as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.

   The test(s) shall be performed within 150 days after startup of the emissions unit.

   The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

   Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

   Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

   A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

   b. Emission Limitation

   14.2 tons per year OC

Applicable Compliance Method

To determine the annual OC emission rate, the following equation shall be used:

E = (Ls - Lw) x D / 2000

Where:

E = OC emission rate in tons per year

Ls = liquid volume of cleaning solvent employed each year (gallons)

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

D = Density of cleaning solvent (pounds/gallon).

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

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

   PTEi = Hi * Wi * SAIi

   Where:

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

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

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

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

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

SAIi = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

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

SAI = 2.2 * (Vol)^0.6

Where:

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

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

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

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. 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
L003 - Open top batch vapor degreaser using trichloroethylene with a solvent/air interface of 72 square feet, maintaining the idling emission limit control option to demonstrate compliance.	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.