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: 13-04297

DATE: 7/27/2004

Morgan Electro Ceramics, Incorporated
William Hocevar
232 Forbes Road
Bedford, OH 44146-5476

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 **13-04297** FOR AN AIR CONTAMINANT SOURCE FOR
MORGAN ELECTRO CERAMICS, INCORPORATED

On 7/27/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Morgan Electro Ceramics, Incorporated**, located at **232 Forbes Road, Bedford**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04297:

Finishing vapor degreaser

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 13-04297

Application Number:	13-04297
APS Premise Number:	1318031627
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Morgan Electro Ceramics, Incorporated
Person to Contact:	William Hocevar
Address:	232 Forbes Road Bedford, OH 441465476

Location of proposed air contaminant source(s) [emissions unit(s)]:
232 Forbes Road
Bedford, Ohio

Description of proposed emissions unit(s):
Finishing vapor degreaser

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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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
Perchloroethylene (OC)	0.82 tpy
n-propyl bromide (VOC)	1.82 tpy

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 - Vapor Degreaser. (Finishing Equipment; Model No. XLE3-WB2).	OAC Rule 3745-31-05 (A)(3)	Perchloroethylene emissions shall not exceed 0.82 tpy. n-Propyl Bromide emissions shall not exceed 1.82 tpy. See Section A.I.2. and Section A.II. The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart T and 40 CFR 82 Subpart G.
	40CFR 63, subpart T	See A.I.2.a.
	40CFR 82, subpart G	See A.I.2.b., A.I.2.c., and A.II.3.
	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)(3) shall not apply to this emission unit. See A.I.2.d.

2. Additional Terms and Conditions

2.a The permittee shall ensure that the perchloroethylene monthly emissions from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms/square

meter/month. This is the same as 30.72 lbs/square feet/month based on a 3-month rolling average (137 lbs/month perchloroethylene emissions rolling average).

2.b The permittee shall ensure that the n-propyl bromide monthly emissions from the solvent cleaning machine do not exceed the 3-month rolling average limit of 334 kilograms/square meter/month. This is the same as 68.41 lbs/square feet/month based on a 3-month rolling average (304 lbs/month n-propyl bromide emissions rolling average).

2.c The permittee agrees to abide by the use conditions outlined in 40 CFR 82 Subpart G Appendix M, "Solvent Cleaning Substitutes That Are Acceptable Subject To Use Conditions" as defined by the US EPA's Significant New Alternatives Policy (SNAP) program.

2.d This rule citation reflects the new exemption added to 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 USEPA 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 USEPA approval of the rule citation as a revision to the Ohio SIP for VOC.

II. Operational Restrictions

1. The maximum perchloroethylene usage shall not exceed 137 lbs/month, based on a 3-month rolling average.

2. The maximum n-propyl bromide usage shall not exceed 304 lbs/month, based on a 3-month rolling average.

3. The quality of the n-propyl bromide cleaning solvent shall meet the following specifications on an "as received" basis:

   a. The n-propyl bromide shall not contain more than 0.05%, by weight, of isopropyl bromide (2-bromopropane) before adding stabilizers or other chemicals (this value is contingent on the "Use Condition" published in the federal register's final rule for 40 CFR 82 Subpart G Appendix M). A certification from the manufacturer shall be considered adequate demonstration that this requirement is satisfied (i.e. a Certificate of Analysis received with the material shipment)

   b. The permittee shall maintain records documenting compliance with this provision for a period of not less than two (2) years from the date of solvent disposition.

III. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: L003

1. The permittee shall maintain a monthly log of solvent additions and removals for the solvent cleaning machine.

2. The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 150 kilograms/square meters/month perchloroethylene on a monthly basis as follows:

   a. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

   b. The permittee shall on the first operating day of the month comply with the following:

      i. Using the records of solvent additions and removals for the previous monthly reporting period, determine perchloroethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit.

      ii. Determine the total amount of perchloroethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms of solvent per month) as specified in the "Testing Requirements" section of this permit.

      iii. Determine the monthly rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in the "Testing Requirements" section of this permit.

   This compliance method may be abandoned and an alternative compliance method may be used when and if the Ohio EPA provides written approval of same.

3. The permittee shall maintain the following records either in electronic or written form for a period of five years:

   a. The dates and amounts of perchloroethylene that are added to the solvent cleaning machine.

   b. The perchloroethylene composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit.

   c. Calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of perchloroethylene from the solvent cleaning machine were determined, and

the results of all calculations.

4. The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 334 kilograms/square meters/month n-propyl bromide on a monthly basis as follows:

   a. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

   b. The permittee shall on the first operating day of the month comply with the following:

      i. Using the records of solvent additions and removals for the previous monthly reporting period, determine n-propyl bromide emissions using the appropriate equation specified in the "Testing Requirements" section of this permit.

      ii. Determine the total amount of n-propyl bromide removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms of solvent per month) as specified in the "Testing Requirements" section of this permit.

      iii. Determine the monthly rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in the "Testing Requirements" section of this permit.

   This compliance method may be abandoned and an alternative compliance method may be used when and if the Ohio EPA provides written approval of same.

5. The permittee shall maintain the following records either in electronic or written form for a period of five years:

   a. The dates and amounts of n-propyl bromide that are added to the solvent cleaning machine.

   b. The n-propyl bromide composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit.

   c. Calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of n-propyl bromide from the solvent cleaning machine were determined, and the results of all calculations.

6. The permittee shall maintain an annual record which lists the name of each degreasing solvent utilized, the number of gallons of each degreasing solvent utilized, and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).

7. The permittee shall maintain a monthly log of solvent additions and removals for the solvent cleaning machine.

IV. Reporting Requirements

1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d) (1) of subpart A, with the following revisions and additions:

   a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.

   b. The report shall include the anticipated compliance approach for the solvent cleaning machine.

   c. The report shall include an estimate of the annual perchloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

2. 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 of the solvent cleaning machine.

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

   c. The solvent/air interface area for the solvent cleaning machine.

   d. The results of the first 3-month average of perchloroethylene emission calculations.

3. The permittee shall submit an annual solvent emissions report by February 1 of each year. This report shall cover the previous calendar year and shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ). The report shall contain the following:

a. The size (solvent/air interface area) and the type of the solvent cleaning machine.

b. The average monthly perchloroethylene consumption for the solvent cleaning machine, in kilograms for each calendar month.

c. The 3-month rolling average perchloroethylene emissions for each calendar month, in pounds, calculated using the method described in the "Testing Requirements" section of this permit.

4. The permittee shall submit an annual exceedance report by February 1 of each year. This report shall cover the previous calendar year and shall be submitted to the Cleveland DAQ. If the perchloroethylene 3-month rolling average of 150 kilograms per square meter per month is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the 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 record keeping 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.

5. The permittee shall submit an annual report which summarizes the annual volatile organic compound emissions as calculated according to the "Testing Requirements" section of this permit. This report shall be submitted to the Cleveland DAQ by February 1 of each year and shall cover the operations of this emissions unit for the previous calendar year.

V. Testing Requirements

1. The permittee shall, on the first operating day of every month:

a. Ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soil. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, or as close to that fill line as possible, immediately prior to calculating monthly emissions as specified in paragraph (1)(b) below. The solvent cleaning

machine does not have to be emptied and filled with fresh unused solvent prior to calculations.

b. Comply with the following requirements:

i. Using the records of all solvent additions and removals for the three previous monthly reporting periods required in the "Monitoring and/or Record Keeping Requirements" section of this permit, determine solvent emission (Ei) using the equation below for cleaning machines with a solvent/air interface:

Ei = (SAi - LSRi - SSRi) / Area i

Where:

Ei = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per square meter of solvent/air interface area per month).

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

LSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per month).

SSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, obtained as described below in paragraph (b) of this section, during the most recent monthly reporting period i (kilograms of solvent per month).

AREAi= the solvent/air interface area of the solvent cleaning machine (square meters).

ii. Determine SSRi from tests conducted using US EPA reference test method 25d or from engineering calculations included in the compliance report.

iii. Determine the monthly rolling average, defined as EAj, for the 3-month period ending with the most recent reporting period using the equation below for cleaning machines with a solvent/air interface:.

EAj = the sum, from j = 1 to j = 3, of (Ei)j, divided by 3,

Where:

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

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

j = 1 = the most recent monthly reporting period.
j = 2 = the monthly reporting period immediately prior to j = 1.
j = 3 = the monthly reporting period immediately prior to j = 2.

2. Emission Limitation:
   0.82 tons perchloroethylene (OC) per year.

   Applicable Compliance Method:
   To determine the annual perchloroethylene (OC) emission rate, the following equation shall be used:

   E = (Ls - Lw) x D / 2000

   Where:

   E = Perchloroethylene (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).

3. Emission Limitation:
   1.82 tons n-propyl bromide (VOC) per year.

   Applicable Compliance Method:
   To determine the annual n-propyl bromide (VOC) emission rate, the following equation shall be used:

   E = (Ls - Lw) x D / 2000

   Where:

   E = n-Propyl Bromide (VOC) 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).

4. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The

potential to emit shall be determined in accordance with the following procedures:

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

PTEi = Hi X Wi X 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).

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

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

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

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

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. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

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

SAI = 2.2 * (Vol)^0.6

Where:

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

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

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

VI. Miscellaneous Requirements

1. In addition to this PTI for L003, we are also processing PTIs 13-04298 for L002 and 13-04314 for L004. Emission unit L003 was installed in February of 1999 and has a potential to emit of 7.74 tpy of perchloroethylene. Emission unit L004 was installed in August of 1998 and has a potential to emit of 6.47 tpy of perchloroethylene. The total potential to emit for these two units is 14.21 tpy of perc which is above the major source threshold for MACT and Title V. The first compliance deadline for MACT Subpart T was December 2, 1997. Since Morgan Electro Ceramics did not obtain federally enforceable permits to restrict the potential to emit prior to installation of these units, they are now considered major for MACT and Title V under the "Once In, Always In" policy established in Engineering Guide 67. Although they cannot obtain a Synthetic Minor permit for L003 and L004, there is nothing that prevents the company from choosing the alternate compliance option allowed for in Subpart T using the 3-month rolling average monthly emission limit for these emission units.

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 - Vapor Degreaser. (Finishing Equipment; Model No. XLE3-WB2).	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None