

A. Source Description

Orbits industries, Inc. has submitted a Permit to Install for one Trichloroethylene (TCE) Open Top Vapor Degreaser.

B. Facility Emissions and Attainment Status

This facility has Title V status due to the facility having the potential to emit TCE--a Hazardous Air Pollutant (HAP)--emissions in excess of 10 tons per year (TPY).

C. Source Emissions

As calculated per 40 CFR 63.465 (e)(1) equation 6, the potential to emit (PTE) for this vapor degreaser is roughly 52.5 TPY VOC, 100% of which is TCE, a HAP. A PTE in excess of 10 TPY for a HAP will result in Title V applicability. However, this facility has requested a Federally Enforceable Permit to Install (Synthetic Minor) in order to avoid Title V permitting requirements. The allowable limits will be 9.98 TPY VOC (TCE), based on a limited TCE usage of 1640 gallons per year.

The only other emissions unit at this facility is a de minimis "etch line" with a PTE of 0.34 TPY PE and 0.07 lb PE/hr.

D. Conclusion

Limiting the TCE usage to 1640 gallons per year will limit the TCE emissions to 9.98 TPY. Therefore, Orbit Industries, Inc. will not be subject to Title V permitting.



State of Ohio Environmental Protection Agency



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

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 13-04251

Fac ID: 1318348304

DATE: 8/24/2004

Orbit Industries, Inc.
Una Alexandrovic
6840 Lake Abram Drive
Middleburg Hts, OH 44130

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 or 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

CLAA

PA

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04251 FOR AN AIR CONTAMINANT SOURCE FOR
ORBIT INDUSTRIES, INC.

On 8/24/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Orbit Industries, Inc.**, located at **6840 Lake Abram Drive, Middleburg Hts, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04251:

TCE Vapor Degreaser -- L001.

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]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04251

Application Number: 13-04251
Facility ID: 1318348304
Permit Fee: **To be entered upon final issuance**
Name of Facility: Orbit Industries, Inc.
Person to Contact: Una Alexandrovic
Address: 6840 Lake Abram Drive
Middleburg Hts, OH 44130

Location of proposed air contaminant source(s) [emissions unit(s)]:
**6840 Lake Abram Drive
Middleburg Hts, Ohio**

Description of proposed emissions unit(s):
TCE Vapor Degreaser -- L001.

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

Orbit Industries, Inc.

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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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.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate 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.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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Orbit Industries, Inc.

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (TCE)	9.98

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L001 - Trichloroethylene Open Top Vapor Degreaser with a SAI of 2.79 m ² .	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(O)(3) OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V 40 CFR 63, Subpart T	8.68 lbs/hr and 9.98 tons per year (TPY) of volatile organic compounds as Trichloroethylene (TCE) In accordance with OAC rule 3745-21-09(O)(6)(b), the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit. See Additional Terms and Conditions A.2.a and A.2.b below See Additional Terms and Condition A.2.c below

2. Additional Terms and Conditions

- 2.a The permittee shall ensure that the annual trichloroethylene (TCE) usage does not exceed 1640 gallons per year, based on a rolling, 12-month summation of the TCE usage rates.
- 2.b TCE emissions are restricted to 9.98 tons per year, based on a rolling, 12-month summation.
- 2.c The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

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- i. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements:
 - (a) an idling and downtime mode cover, as described in Section B.3.a.i below, that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects; and,
 - (b) a reduced room draft as described in Section C.3.b below.
 - 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 vapor 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. This requirement does not apply to a vapor cleaning machine that uses steam to heat the solvent.
 - v. The solvent vapor 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 vapor cleaning machine shall have a primary condenser.
 - vii. If the solvent cleaning machine uses a lip exhaust it shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii).
- 2.d** 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 trichloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

B. Operational Restrictions

- 1. The maximum annual trichloroethylene (12.17 lbs TCE/gallon or less) usage shall not exceed 1640 gallons, based upon a rolling, 12-month summation of the TCE usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed TCE usage as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative TCE Usage (gallons)</u>
1	137
1-2	274
1-3	411
1-4	548
1-5	685
1-6	822
1-7	959
1-8	1096
1-9	1233
1-10	1370
1-11	1507
1-12	1640

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual TCE usage shall be based upon a rolling, 12-month summation of the TCE usage rates.

- 2. The permittee/operator of a batch vapor cleaning machine with a solvent/air interface area greater than 1.21 square meters shall employ the following control combination:
 - a. Freeboard refrigeration device;
 - b. reduced room draft; and,
 - c. freeboard ratio of 1.0.

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3. The permittee shall meet all of the following work and operational practices as applicable:
 - a. Control air disturbances across the cleaning machine opening(s) by incorporating either of the following methods:
 - i. Cover(s) to each 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, or
 - ii. A reduced room draft as described in Section C.3.b.
 - b. The parts baskets or the parts being cleaned 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 meters 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 shall be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio Environmental Protection Agency (Ohio EPA) or the Cleveland Division of Air Quality (CDAQ);
 - e. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped;
 - f. During startup of the solvent cleaning machine, the primary condenser shall be turned on before the sump heater;
 - g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
 - h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
 - i. The solvent cleaning machine and associated controls shall be maintained as recommended

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by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Ohio EPA's or CDAQ's satisfaction 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 appendix A of 40 CFR 63, Subpart T if requested during an inspection by the Ohio EPA or CDAQ;
- 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 would not allow liquid solvent to drain from the container; and,
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records of the following:
 - a. amount of solvent used per month in this emissions unit;
 - b. actual hours of operation, per month, for this emissions unit;
 - c. a log of solvent additions and removals for the solvent cleaning machine; and,
 - d. all control equipment maintenance, such as replacement of the carbon in the carbon adsorption unit.
- 2. The permittee shall conduct monitoring of each control device used to comply with 40 CFR 63.463 and the terms and conditions of this permit.
- 3. The permittee shall determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in the requirements below:
 - a. If a freeboard refrigeration device is used to comply with the standards, the permittee shall ensure that the chilled air blanket temperature (in F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point; and,
 - b. If a reduced room draft is used to comply with the standards, the permittee shall comply with the following requirements:
 - i. Ensure that the flow or movement of air across the top of the freeboard area of the

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- solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any one time as measured using the procedures in 40 CFR 63.466(d); and,
- ii. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466(d).
4. If any of the requirements above in Section C.2 and C.3. are not met, determine whether an exceedance has occurred using the criteria below:
 - a. An exceedance has occurred if the requirements in Section C.3.b.ii have not been met; and,
 - b. An exceedance has occurred if the requirements in Section C.3.a or C.3.b.i have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
 5. The permittee shall conduct monitoring and record the results on a weekly basis for the control device specified below:
 - a. For a freeboard refrigeration device, the permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
 6. The permittee shall conduct monitoring and record the results on a monthly basis for the control devices specified below:
 - a. For a cover (working-mode, downtime-mode, and/or idling-mode cover), the permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and it free of cracks, holes, and other defects.
 7. When using a reduced room draft, the permittee shall monitor and record the results as specified below:
 - a. If the reduced draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly

monitoring of room parameters:

- i. Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified below:
 - (a) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
 - (b) Orient a velometer in the direction of the wind current at each of the four corners of the machine;
 - (c) Record the reading for each corner; and,
 - (d) Average the values obtained at each corner and record the average wind speed.
 - ii. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- b. If an enclosure (full or partial) is used to achieve a reduced room draft, the permittee shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified in Section C.7.a above and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.
- i. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
 - ii. Record the maximum wind speed.

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8. The permittee shall monitor the hoist speed as described below:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
 - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the satisfaction of the Cleveland Division of Air Quality 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.
9. 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.
10. The permittee shall maintain records, in written or electronic form, as specified below for a period of 5 years.
 - a. The results of control device monitoring required above in Section C.5, C.6, C.7 and C.8 (per 40 CFR 63.466); and,
 - b. Information on the actions taken to comply with Section C.2 and C.3 above. This information shall include records of 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 accepted levels.

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

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11. The permittee shall maintain records of the following information:
 - a. For the first 12 calendar months of operation following the issuance of this permit, the TCE usage rate for each month; and,
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the TCE usage.

D. Reporting Requirements

1. The permittee shall notify CDAQ in writing for the identification of each exceedance specified below. This notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
 - a. TCE emissions exceed 8.68 lbs/hr (on an average monthly basis); or,
 - b. TCE emissions exceed 9.98 tons/year.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month TCE usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels. These reports are due by April 30, July 31, October 31 and January 31 of each year and shall cover the previous 3-month period.
3. The permittee shall submit to CDAQ an initial statement of compliance for this solvent cleaning machine. For new sources, this report shall be submitted to CDAQ no later than 150 days after startup. This statement shall include the requirements specified below:
 - a. The name and address of the owner or operator;
 - b. The address (i.e., physical location) of the solvent cleaning machine;
 - c. A list of the control equipment used to achieve compliance for each solvent cleaning machine;
 - d. For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measure on or during the first month after the compliance date; and,
 - e. Conditions to maintain the wind speed requirements of Section C.3.b above.

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4. 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's responsible official 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 in Section B.3.j above, per 40 CFR 63.463(d)(10)"; and,
 - b. An estimate of solvent consumption for the solvent cleaning machine during the reporting period.

4. The permittee shall submit an exceedance report on a semiannual basis. If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection or if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection, 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 CDAQ. 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) CDAQ does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
 - a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
 - b. If no exceedance has occurred, a statement to that effect shall be submitted.

6. The permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions below are met:
 - a. The source has demonstrated a full year of compliance without an exceedance;
 - b. The permittee continues to comply with all relevant recordkeeping and monitoring

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Emissions Unit ID: **L001**

requirements specified in subpart A (General Provisions) and in 40 CFR 63, Subpart T.

- c. The Ohio EPA or CDAQ does not object to a reduced frequency or reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions).

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E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

9.98 tons per year of volatile organic compounds (VOCs)

Applicable Compliance Method

Compliance shall be determined using the following calculation:

$$(n \text{ gallons/year}) \times (12.17 \text{ lbs VOC/gal}) \times (1 \text{ ton}/2000 \text{ lbs}) = \text{TPY VOC}$$

Where:

$n = (\text{actual gallons of solvent used in this emissions unit}) - (\text{amount of waste recovered--if any})$

12.17 lbs VOC/gal = maximum VOC content of solvent used

- b. Emission Limitation

8.68 lbs VOC per hour

Applicable Compliance Method

Compliance shall be based on the following calculation:

$$(n \text{ gallons/month}) \times (12.17 \text{ lbs VOC/gal}) \times (1 \text{ month}/x \text{ hours}) = \text{lbs VOC/hr}$$

Where:

$x = \text{actual number of hours this emissions unit operates per month}$

2. The permittee shall determine their potential to emit (PTE) using the procedures described below. A facility's total PTE is the sum of the HAP emissions from the solvent cleaning operations, plus all HAP emissions from other sources within the facility.

- a. Determine the PTE for each individual solvent cleaning using the following equation:

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$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kilograms of solvent per year)

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

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

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

= 1.95 kilograms per square meter per hour for batch vapor machines

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). 40 CFR 63.461 defines the SAI area for those machines that have a SAI.

- b. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

F. Miscellaneous Requirements

None.