



11/18/2014

Cathleen Carter
STADCO AUTOMATICS
632 YELLOW SPRINGS-FAIRFIELD RD
FAIRBORN, OH 45324

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0829060007
Permit Number: P0117746
Permit Type: Initial Installation
County: Greene

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- How to appeal this permit
• How to save money, reduce pollution and reduce energy consumption
• How to give us feedback on your permitting experience
• How to get an electronic copy of your permit

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

Certified Mail

Table with 2 columns: Yes/No and various permit conditions like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG.

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
STADCO AUTOMATICS**

Facility ID:	0829060007
Permit Number:	P0117746
Permit Type:	Initial Installation
Issued:	11/18/2014
Effective:	11/18/2014
Expiration:	2/28/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
STADCO AUTOMATICS

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Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

Authorization

Facility ID: 0829060007
Application Number(s): A0051894
Permit Number: P0117746
Permit Description: Initial installation PTIO for an open top halogenated vapor degreaser with freeboard refrigeration and a freeboard ratio greater than 1.0.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 11/18/2014
Effective Date: 11/18/2014
Expiration Date: 2/28/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

STADCO AUTOMATICS
632 FAIRFIELD-YELLOW SPRINGS RD.
FAIRBORN, OH 45324

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

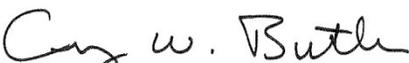
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

Authorization (continued)

Permit Number: P0117746

Permit Description: Initial installation PTIO for an open top halogenated vapor degreaser with freeboard refrigeration and a freeboard ratio greater than 1.0.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	L004
Company Equipment ID:	Baron-Blakeslee vapor degreaser
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
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B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
STADCO AUTOMATICS
Permit Number: P0117746
Facility ID: 0829060007
Effective Date: 11/18/2014

C. Emissions Unit Terms and Conditions



1. L004, Baron-Blakeslee vapor degreaser

Operations, Property and/or Equipment Description:

Open Top Vapor Degreaser with cover and refrigerated free board

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) As effective November 30, 2001	Compliance with this rule is satisfied by compliance with the requirements of 40 CFR Part 63, Subpart T. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) As effective December 1, 2006	See b)(2)b.
c.	OAC rule 3745-21-09(O)(3)	See b)(2)e., c)(1), d)(7), e)(5) and f)(2).
d.	40 CFR Part 63, Subpart T	See b)(2)c through b)(2)e., c)(1), d)(1) through d)(6), e)(1) through e)(3) and f)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code



(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This PTIO for this air contaminant source takes into account the voluntary throughput restriction of 525 gallons of trichloroethylene per year, as proposed by the permittee, for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A(3):
- c. The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ one of the control combinations listed in Table 1 of 40 CFR Part 63, Subpart T [40 CFR 63.463(b)(1)]. The permittee has implemented the following combination of control measures:
 - i. a chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, that is no greater than 30 percent of the solvent's boiling point and;
 - ii. maintenance of a freeboard with a freeboard ratio equal to 1.0 or greater.
- d. The permittee shall ensure that the solvent vapor cleaning machine conforms to the following design requirements:
 - i. The 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;
 - ii. The 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;
 - iii. The vapor cleaning machine shall have a primary condenser; and
 - iv. The vapor cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment.
- e. The open top vapor degreaser shall be equipped with and shall employ a cover and safety switches as described below:
 - i. The permittee shall ensure that an idling/downtime mode cover is in place whenever parts are not in the solvent cleaning machine and it completely covers the cleaning machine openings during downtime and during the idling mode, unless solvent is being added or removed or maintenance,



monitoring, and/or solvent level measurements are being conducted. The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects;

- ii. A condenser flow switch and thermostat (or other such device) shall shut off the sump heat if the condenser coolant is either not circulating or too warm;
- iii. If using a spray application, a spray safety switch shall shut off the spray pump if the vapor level drops below any fixed spray nozzle;
- iv. A water flow switch or water pressure switch (or other such device) shall shut off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored; and
- v. 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.

c) Operational Restrictions

- (1) The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. The cover shall be kept closed at all times except when processing work loads through the degreaser;
 - b. Porous and/or absorbent materials shall not be cleaned;
 - c. Workloads shall occupy no more than 50 percent of the degreaser's open-top area;
 - d. During startup the primary condenser shall be turned on before the sump heater;
 - e. During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
 - f. Solvent carry-out shall be minimized by:
 - i. racking parts so that solvent drains freely and is not trapped;
 - ii. moving parts in and out of the degreaser at less than (3.4 meters per minute) 11 feet per minute;
 - iii. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
 - iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and



- v. allowing parts to dry within the degreaser for at least 15 seconds or until dripping has stopped and the parts are visually dry, whichever is longer.
 - g. Solvent spraying shall only be conducted within the vapor zone;
 - h. Solvent leaks shall be repaired immediately, or the degreaser shall be shut down;
 - i. The vapor degreaser shall be operated so that water cannot be visually detected in solvent exiting the water separator;
 - j. No ventilation fans shall be used near the degreaser opening;
 - k. When the cover is open, the open top vapor degreaser shall not be exposed to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip;
 - l. A permanent, conspicuous label, summarizing the operating procedures shall be posted on or near to the degreaser;
 - m. When solvent is added or drained, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface; and
 - n. Solvent waste, still bottoms and sump bottoms shall only be 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.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall properly install, operate, and maintain a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
 - (2) Using a thermometer or thermocouple, the permittee shall measure and record, on a weekly basis, the temperature at the center of the air blanket during the idling mode.
 - (3) The permittee shall conduct a monthly visual inspection of the idling-mode/downtime cover and record the results. The records shall document that the cover is opening and closing properly, that it completely covers the cleaning machine openings when closed, is free of cracks, holes or other defects.
 - (4) The permittee shall monitor the automated parts handling system as described below and maintain records of the results:
 - a. Determine the parts handling speed by measuring the time it takes for a part to travel a fixed distance. The speed is equal to the distance in meters or feet divided by the time in minutes (meters or feet per minute).
 - b. The permittee shall document that the parts and parts basket does not occupy more than 50 percent of the solvent/air interface area, if the parts handling speed



exceeds 0.9 meters per minute (3 feet per minute). This determination shall be re-calculated if the parts or basket size increase.

- c. The permittee shall conduct monthly monitoring of the automated parts handling system speed. If after the first year, no exceedances of the parts handling speed are measured, the permittee may begin monitoring the parts handling speed quarterly.
 - d. If an exceedance of the automated parts handling system speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - e. If the permittee can demonstrate in the initial compliance report, and to the satisfaction of the regulating agency, that the automated parts handling system speed cannot exceed a speed of (3.4 meters per minute) 11 feet per minute, the required monitoring frequency may be quarterly, including during the first year of compliance.
- (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 vapor degreaser and control equipment;
 - b. records of the halogenated HAP solvent content for each solvent used in the vapor degreaser;
 - c. the date of installation for the solvent cleaning machine and all of its control devices;
- (6) The vapor degreaser and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using alternative maintenance practices that have been demonstrated to the satisfaction of the regulating agency (appropriate Ohio EPA District Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.
- (7) The permittee shall maintain records of the following information:
- a. the types of solvents employed in the open top vapor degreaser, including the chemical name(s) and concentration(s);
 - b. all maintenance conducted on the refrigerated chiller, including the date and activity; and
 - c. the temperature (or temperature range) at which each cleaning solvent is maintained.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.



e) Reporting Requirements

- (1) The permittee shall submit an initial statement of compliance to the regulating agency no later than 150 days following startup of the unit. This report shall include the following information:
 - 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 options used to achieve compliance; and
 - d. for each piece of equipment required to be monitored, a list of the parameters monitored, and the values of these parameters measured on or during the first month after the compliance date.

- (2) The permittee shall submit an annual report by February 1 of each year, following the year for which the report is being made. This report shall contain the following information:
 - a. a signed statement, by the facility owner or his designee, stating that “all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard”; and
 - b. an estimate of solvent consumption during the reporting period and emissions of each HAP.

- (3) The permittee shall submit an exceedance report on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the regulating agency of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:
 - a. the emissions unit has demonstrated a full year of compliance without an exceedance;
 - b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and
 - c. the regulating agency 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.

An exceedance or omission of any of the following limits, monitoring parameters, and/or requirements from the standard shall be included in the exceedance reports:



- d. The permittee shall submit a deviation report if the temperature of the chilled air blanket, measured at its center, was greater than 30% of the solvent's boiling point and was not adjusted within 15 days of detection;
 - e. If the freeboard ratio is not maintained at 1.0 or greater; or
 - f. if the cover did not completely cover the cleaning machine openings, when containing the HAP solvent and during any idling or downtime mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements were being conducted. Cracks, holes or other defects to the cover, that were not repaired or the cover not replaced within 15 days of detection.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:

a. Emissions Limitation/Control Requirements

The permittee has selected or has installed and shall employ freeboard refrigeration and freeboard ratio greater than 1.0 as the control combination required from Table 1, of 40 CFR 63.463(b).

Applicable Compliance Method

The permittee shall demonstrate compliance with the selected control combination, according to b)(2)c. b)(2)e., c)(1), d)(1) through d)(7) and e)(1) through e)(3).

b. Emissions Limitation/Control Requirements

The chilled air blanket temperature measured at the center of the air blanket shall be no greater than 30% of the solvent's boiling point.

Applicable Compliance Method

The solvent's boiling point shall be documented and, on a weekly basis, the permittee shall measure the temperature at the center of the air blanket during the idling mode using a thermometer or thermocouple.



c. Emissions Limitation/Control Requirements

The freeboard ratio shall not exceed 1.0.

Applicable Compliance Method

The permittee shall measure and record the freeboard ratio before and after each solvent addition to assure compliance with the control requirement limitation.

- (2) The permittee shall quantify VOC emissions through a material balance test, conducted for a sufficient period of time to compute an average emission rate. The following procedures shall be implemented in order to perform this material balance test and document the average VOC emissions from this emissions unit, as follows:
- a. the degreaser tank shall be cleaned before testing begins;
 - b. records shall be maintained of the weight or volume of solvent used to initially fill the cleaning tank and the volume or weight of the make-up solvent added to the tank during the test period;
 - c. at the end of the test period (which can coincide with the normal solvent replacement cycle) the used solvent shall be pumped or drained out of the tank and the volume or weight measured using the same method applied in [b] above;
 - d. a record shall be maintained of the time (hours) passing between filling the tank with fresh solvent (start of test period) to the removal of the waste solvent, as well as, the number of parts or weight of the work load cleaned during the test period;
 - e. a sample of the used solvent shall be analyzed for the percent oil, metal chips, and other contaminants (the oil and solvent proportions can be estimated by weighing samples of used solvent before and after boiling off the solvent);
 - f. from the analysis of the used/waste solvent in [e], the volume or weight of oils, dissolved from the cleaned parts or work load, shall be documented;
 - g. the total VOC emissions from the cleaning tank during the test period shall be calculated* from the volume or weight of solvent displaced by the oil, plus the total makeup solvent added to the tank to the same initial fill line, and this volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the solvent; or
 - h. if the final solvent line is below the initial solvent line in the tank when the waste solvent is pumped or drained out, the total VOC emissions from the cleaning tank during the test period shall equal the measured volume or weight of fresh solvent used to initially fill the tank, minus the total volume or weight of used solvent pumped/drained out, plus the volume or weight of solvent displaced by the oil (calculated in [e] above), plus the volume or weight of makeup solvent added to the tank during the test period, and this total volume or weight multiplied by the



solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent; or

- i. as an alternative to the procedures for estimating VOC emission from the cleaning tank in [g] or [h] above, the VOC emissions may be calculated as the difference between the total volume of solvent added to the cleaning tank during the test period (the amount used to initially fill the tank and the makeup solvent added) and (minus) the solvent contained in the used solvent pumped or drained out; and this difference in volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent;
- j. the average VOC emissions rate shall be calculated by dividing the total emissions calculated in [g], [h], or [i] by the total hours of the test period (and/or divided by the total parts cleaned during the test period if an emissions per production rate is required) as recorded in [d]; and
- k. if waste solvents pumped from the solvent cleaning tank are not immediately sealed to prevent evaporation and if a record is not maintained of the volume or amount sent offsite for recovery and/or disposal, such waste solvent losses shall be included with those calculated above in any required emissions report(s) if it cannot be demonstrated that this volume of material has been properly recovered or disposed of and/or has not been lost through evaporation to the atmosphere.

* If solvent measurements are recorded by volume the density of the solvent shall be used to convert gallons to pounds.

g) Miscellaneous Requirements

- (1) None.