



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

11/4/2015

Joseph DePiero
Wedge Products
2181 Enterprise Pkwy
Twinsburg, OH 44087

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677130077
Permit Number: P0119513
Permit Type: Renewal
County: Summit

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

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 Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Wedge Products**

Facility ID:	1677130077
Permit Number:	P0119513
Permit Type:	Renewal
Issued:	11/4/2015
Effective:	11/4/2015
Expiration:	11/4/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
Wedge Products

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Final Permit-to-Install and Operate
Wedge Products
Permit Number: P0119513
Facility ID: 1677130077
Effective Date: 11/4/2015

Authorization

Facility ID: 1677130077
Application Number(s): A0054269
Permit Number: P0119513
Permit Description: Renewal FEPTIO for an open-top batch vapor degreaser utilizing perchloroethylene.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 11/4/2015
Effective Date: 11/4/2015
Expiration Date: 11/4/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Wedge Products
2181 Enterprise Pkwy
Twinsburg, OH 44087

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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
Wedge Products
Permit Number: P0119513
Facility ID: 1677130077
Effective Date: 11/4/2015

Authorization (continued)

Permit Number: P0119513

Permit Description: Renewal FEPTIO for an open-top batch vapor degreaser utilizing perchloroethylene.

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

Emissions Unit ID:	L001
Company Equipment ID:	Vapor Degreaser
Superseded Permit Number:	P0106776
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Wedge Products
Permit Number: P0119513
Facility ID: 1677130077
Effective Date: 11/4/2015

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.

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
Wedge Products
Permit Number: P0119513
Facility ID: 1677130077
Effective Date: 11/4/2015

B. Facility-Wide Terms and Conditions



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
Wedge Products
Permit Number: P0119513
Facility ID: 1677130077
Effective Date: 11/4/2015

C. Emissions Unit Terms and Conditions

1. L001, Vapor Degreaser

Operations, Property and/or Equipment Description:

Vapor Degreaser - Phillips (model 2C-2000E) open-top batch vapor degreaser utilizing perchloroethylene

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. b)(1)b., d)(8), e)(10).

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), PTI 16-02276 issued 4/3/2003	Organic compounds (OC) emissions shall not exceed 0.37 ton per month and 4.46 tons per year.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	Annual perchloroethylene usage rates and combined annual emissions shall not exceed the following as a rolling 12-month summation: 660 gallons of perchloroethylene and 4.46 tons per year of perchloroethylene.
c.	OAC rule 3745-21-09(O)	Exempt. See b)(2)a.
d.	40 CFR Part 63, Subpart T	See b)(2)b. and b)(2)c. below.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(O)(6)(b), paragraphs (O)(2) through (O)(5) of this rule shall not apply to any solvent metal cleaning operation which is subject

to 40 CFR Part 63, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions of a permit-to-install and operate (PTIO).

- b. The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ Option 3 (working-mode cover, freeboard refrigeration device), as the chosen control combination selected from Table 1 of Subpart T [40 CFR 63.463(b)(1)(i)].
- c. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
 - i. An idling and downtime mode cover, as described in (c)(1)a., 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.
 - ii. The solvent cleaning machine shall have a freeboard ratio of 0.75 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 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.
 - v. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - vi. The vapor cleaning machine shall have a primary condenser.

c) Operational Restrictions

(1) The permittee shall meet the following required work and operational practices:

- a. Air disturbances across the solvent cleaning machine shall be controlled by using an idling and downtime mode cover that shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
- b. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 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 any solvent cleaning machine unless an equally effective approach has been approved by the Administrator.
 - e. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - f. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - g. During shutdown of each vapor 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 any 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 vapor cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - j. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A of 40 CFR Part 63, Subpart T if requested during an inspection by the Administrator.
 - 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.
 - l. Sponges, fabric, wood, and paper products shall not be cleaned.
- (2) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance with 40 CFR 63.463, as described in terms d)(2)-(4) of this permit; and these parameters shall meet the following requirements:
- a. 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.
 - b. The permittee shall ensure that the working-mode cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - c. The permittee shall ensure that the working-mode cover is maintained free of cracks, holes, and other defects.

- d. The permittee shall ensure that the idling-mode cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - e. The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirement limitation. The date of record shall be included with the recorded measurements.
 - (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 working-mode/idling-mode/downtime-mode cover(s) and shall maintain a record of the results. The records shall document if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - (4) The permittee shall monitor the hoist speed as described below and maintain records of the results:
 - 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 monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the Administrator's satisfaction in the initial compliance report that the hoist 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.
 - (5) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

- c. Records of the halogenated hazardous air pollutant (HAP) perchloroethylene solvent content for each solvent used in the solvent cleaning machine.
- (6) The permittee shall maintain the following records in electronic or written form for a period of five years for the solvent cleaning machine:
- a. The results of the control device monitoring required in d)(2), d)(3), and d)(4);
 - b. Information on the actions taken to comply with the requirements in c)(2). 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 solvent consumption for the solvent cleaning machine.
- (7) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:
- a. The device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - b. The vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
 - c. The primary condenser.
- Included in the record shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.
- (8) The permittee shall maintain the following monthly records:
- a. the total number of gallons of perchloroethylene employed;
 - b. the number of gallons of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation;
 - c. the solvent usage rate for the month (i.e., (a) - (b)), in gallons;
 - d. the total monthly OC/perchloroethylene emission rate, in tons per month (i.e., (c) * (the solvent density (13.5 lbs/gal)) / 2000 lbs/ton);
 - e. the rolling 12-month summation of the perchloroethylene usage figures, in gallons; and
 - f. the rolling, 12-month summation of the total perchloroethylene emissions, in tons (i.e., the sum of (d) for the previous 12 calendar months).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER report:
 - 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 a quarterly deviation report if monthly (or quarterly if adjusted after the first year) measurements and records are not maintained of the speed of the solvent cleaning machine’s automated parts handling system, or if these measurements exceed 3.4 meters per minute (11 feet per minute).
- (4) 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 in 40 CFR Part 63, Subpart T (as included in the terms and conditions of this permit); and
 - c. The regulating agency does not object to a reduced frequency of reporting for the affected emissions unit as provided in 40 CFR 63.1(e)(3)(iii).
- (5) The permittee shall submit a deviation report if the cover, when closed, did not completely cover the cleaning machine openings; or the cover was open at times other than for parts entrance or removal, or solvent addition or removal; and/or the cover had cracks, holes or other defects that were not repaired or the cover not replaced within 15 days of detection.
- (6) The permittee shall submit a deviation report 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, shall also be reported.

- (7) The permittee shall submit a deviation report if the freeboard ratio is not maintained at 0.75 or greater.
- (8) Each exceedance report shall be submitted by the 30th day following the reporting period and shall contain the following information:
 - a. If an exceedance has occurred, the standard, monitored parameter, emission limit, or other requirement that was exceeded; the reason for the exceedance and a description of the actions taken; the actions taken to correct any future exceedance of the same limit or requirement; and the magnitude and duration of each exceedance;
 - b. Action(s) taken to comply with term c)(2) of this permit (as recorded per term d)(6)b. of this permit) 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;
 - c. If no exceedance of a parameter has occurred, or a piece of equipment has not been inoperable, out of control, repaired, or adjusted, a statement to that effect shall be submitted;
 - d. If no exceedance has occurred, due to corrections and adjustments made to avoid an exceedance, a statement specifying those details shall be submitted.
- (9) The permittee shall submit quarterly deviation reports if any of the following control equipment is not repaired or replaced within 15 days of any malfunction, and/or the machine is not shut down until repaired:
 - a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
 - c. the primary condenser.

Included in the report shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

- (10) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month emission limitation for perchloroethylene; and
 - ii. all exceedances of the rolling, 12-month usage limitation for perchloroethylene.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (11) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

4.46 tons per year of perchloroethylene

Applicable Compliance Method:

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 for each emissions unit shall be determined in accordance with the following procedures:

- i. determine the potential to emit for each individual solvent cleaning machine using the following equation:

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

where:

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

$$TPY \text{ limit} = PTE_i \times 0.0011023$$

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 and cold cleaning machines
= 1.12 kilograms per square meter per hour for in-line solvent cleaning machines

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters).

- b. Emissions Limitation/Control Requirements:

The permittee has selected or has installed and shall employ Option 3, as the control combination required from Table 1, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, Option 3, through compliance with the "Additional Terms and Conditions", "Operational Restrictions", and "Monitoring and Record keeping Requirements" and "Testing Requirement" sections of this permit.

- c. 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.

d. Emissions Limitation/Control Requirements:

The freeboard ratio shall not be less than 0.75.

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.

e. Emissions Limitation/Control Requirements:

The hoist speed shall not exceed 3.4 meters per minute (11 feet per minute).

Applicable Compliance Method:

The permittee shall determine the hoist speed by measuring the time it takes for the hoist, part, or part basket to travel a measured distance, and at the frequency as required in the "*Monitoring and Record keeping Requirements*" section of this permit. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

f. Emission Limitations:

OC emissions shall not exceed 0.37 ton per month and 4.46 tons per year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined based upon the record keeping requirements of section d)(8) above.

g) Miscellaneous Requirements

(1) None.