Ohio Environmental Protection Agency

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

4/7/2016

Certified Mail

Mr. William Bonds
HELICAL LINE PRODUCTS COMPANY
659 MILLER ROAD
AVON LAKE, OH 44012

Facility ID: 0247030987
Permit Number: P0118668
County: Lorain

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Title V Permit Renewal
HELICAL LINE PRODUCTS COMPANY
659 MILLER ROAD, , Avon Lake, OH 44012
ID#: P0118668
Date of Action: 4/7/2016
PermitDesc: Renewal of Title V Permit for a batch vapor degreaser used to remove lubricants from metal coils..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Christine McPhee, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200

Ohio Environmental Protection Agency

# Statement of Basis For Air Pollution Title V Permit

| | |
|---|---|
| Facility ID: | 0247030987 |
| Facility Name: | HELICAL LINE PRODUCTS COMPANY |
| Facility Description: | Pole line hardware |
| Facility Address: | 659 MILLER ROAD, Avon Lake, OH 44012 |
| Permit #: | P0118668, Renewal |

This facility is subject to Title V because it is major for: ☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds
☐ Nitrogen Oxides ☐ $PM_{10}$ ☒ Single Hazardous Air Pollutant (HAP) as trichloroethylene ☒ Combined HAPs ☐ GHG
☐ Title IV ☒ Maximum Available Control Technology Standard(s) - 40 CFR Part 63, Subpart T - National Emission Standard for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning

**A. Standard Terms and Conditions**

| | |
|---|---|
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)? | Yes, see Potential to Emit summary table on p. 1 of the Permit Review Discussion and the Facility-wide PTE emission estimates evaluation. Both documents are attached to the permit detail page of the electronic permit recommendation in STARS. |
| Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them. | No, there are no “common control” issues. |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1) | NA. |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3) | NA. |
| Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | NA. |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E) | Section B. now includes 40 CFR §63.471 facility-wide standards from NESHAP for Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T. |
| Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C. | NA, L001 is the only significant EU and it is subject to a Maximum Achievable Control Technology (MACT) standard and therefore is exempt from the CAM rule requirements. |

**B. Facility-Wide Terms and Conditions**

| Term and Condition (paragraph) | Basis | | Comments |
|---|---|---|---|
| | SIP (3745- ) | Other | |
| B.1. & B.1.a) | None. | None. | ND, there are no applicable rules in section B. which are state enforceable only. |
| B.2. | None. | 40 CFR Part 63, Subpart T | New citation of rule as applicable to L001, open top vapor degreaser using trichloroethylene (TCE).<br>ET- no emissions testing required for an EU subject to an alternative emission standard; see section C.1.b)(1)c. |
| B.3. | None. | 40 CFR 63.471(b)(2) | New facility-wide 12-month rolling total emission limit(s) from 40 CFR Part 63, Subpart T. Second paragraph identifies 14,100 kg/yr. as an applicable limit but also states that if other solvents are employed or the 60,000 kg/yr. limit if multiple solvents are employed. |
| B.4. | None. | 40 CFR 63.471(b)(1) | R- New log for solvent additions and deletions for <u>each</u> solvent cleaning machine. The application included only one (1) machine, L001. |
| B.5. | None. | 40 CFR 63.471(e) | R-New record of amounts of solvent added and solvent content of wastes removed for <u>each</u> solvent cleaning machine. |
| B.6. | None. | 40 CFR 63.471(f) | Rp-New initial notification report submittal "*In the event that an additional solvent cleaning machine or a replacement to the currently permitted machine(s) is installed and operated ….*". The original initial notification report was already submitted. |
| B.7. | None. | 40 CFR 63.471(g) | Rp-New initial statement of compliance report submittal "*In the event that an additional solvent cleaning machine or a replacement to the currently permitted machine(s) is installed and operated ….*". The original initial statement of compliance report was already submitted. |
| B.8. | None. | 40 CFR 63.471(h) | Rp-New solvent emission report submittal for the following: a) ave. monthly solvent consumption, kg./month for the facility; & b) the 12-month rolling solvent emissions estimates. |
| B.9. | None. | 40 CFR 63.471(c)(1), (2) and (3) | Compliance method to determine amounts of solvent additions, solvent deletions, and the monthly solvent emissions from each machine, it is the same method currently included in section C.1. for L001 emissions. The new requirement is that it is applicable to each machine, if ever another solvent cleaning machine is installed and operated. |
| B.10. | None. | 40 CFR 63.471(c)(4) | New compliance method to determine 12-month rolling total emissions per EU. |
| B.11. | None. | 40 CFR 63.471(c)(5) | New compliance method to determine facility-wide, 12-month rolling total emissions for each HAP. |
| B.12. | None. | 40 CFR 63.471(b)(2) and (d) | New compliance method to determine facility-wide, weighted (on a methylene chloride basis), 12-month rolling total emissions for all HAPs (PCE, TCE & MC). |
| B.13. | None. | None. | Misc. – New statement to clarify the application for the permit "… *includesonly one solvent cleaning machine (L001) which employed only TCE solvent*." |

## C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s)
R = record keeping requirements
Rp = reporting requirements

| | | | |
|---|---|---|---|
| | applicable is (are) not to a specific emissions unit) | ET = | emission testing requirements (not including compliance method terms) |
| OR = | operational restriction | St = | streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement |
| M = | monitoring requirements | Misc = | miscellaneous requirements |
| ENF = | did noncompliance issues drive the monitoring requirements? | | |

| EU(s) | Limitation | Basis | | ND | OR | M | EN | R | Rp | ET | St | Misc | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | SIP (3745- ) | Other | | | | | | | | | | |
| L001 | 8.05 tons VOC/yr. as TCE; C.1.b)(1)a. | 31-05-(A)(3) | 40 CFR Part 63, Subpart T | N | N | N | N | Y | Y | N | N | Y | R - d)(1)a. now specifies recording amounts of solvent added in gals.; and d)(1)b. now specifies dates & gals. of waste removed. d)(2) No change to recording of annual TCE density & gals. used& amount of waste sent off-site to waste treatment facility.<br>Rp - e)(2)d. new term to report annual VOC emissions for federal enforceability.<br>Compliance method – f)(1)b. new solvent content factor included for waste for more accurate estimate of emissions. New statement to identify that solvent content of waste was determined to be 0.80 gal. TCE/gal. waste is determined via engineering estimate.<br><br>Misc. – g)(1) new term to explain that L001 is new EU per OAC rule 3745-31-01 and subject to OAC rule 3745-31-05(A)(3). New explanation that modification PTI 02-19646, issued 12/21/2004, was for an administrative modification to increase the allowable, annual VOC emissions for increase in projected annual emissions due to submittal of corrected values for the length and width of the top opening of the solvent/air interface. |
| L001 | Design & work practice requirements; C.1.b)(1)b. | 21-09(O)(3) | None | Y | N | N | N | N | N | N | N | N | ND – b)(2)a. no change to statement that EU subject to 40 CFR Part 63, Subpart T is exempt from OAC rule 3745-21-09(O)(3) . |
| L001 | 150 kg. TCE/m²/month, as a 3-month rolling average; C.1.b)(1)c. | NA | 40 CFR Part 63, Subpart T & App. A & B | N | Y | N | N | Y | Y | N | N | Y | OR-c)(1) moved from M&R section in previous permit is requirement for monthly solvent addition to fill line with clean solvent to better allow solvent usage tracking.<br>R-d)(1)a. now specifies recording amounts of solvent added in gals.; and d)(1)b. now specifies dates & gals. of waste removed.<br>Rp-e)(1)semi-annual dev. rpt. now includes new clause to include reports of deviations of "… *alternative emissions limit per 40 CFR 63.464*" for clarification and meeting federal enforceability requirements.<br>Compliance method – f)(1)a.i. new calculation of $LSR_i$, amount of liquid solvent in waste removed from EU for more accurate estimate of monthly emissions. f)(1)a.ii. is same method to determine monthly rolling ave. emissions over a 3-month period.<br>ET-no (exhaust gas) testing required for EU subject toalternative emissions limit per 40 CFR 63.464.<br>Compliance method –f)(1)c. no change to the method to determine potential HAP emissions, as TCE from L001, as described in 40 CFR 63.465(e ). |

| EU(s) | Limitation | Basis | | ND | OR | M | EN | R | Rp | ET | St | Misc | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | SIP (3745- ) | Other | | | | | | | | | | |
| | | | | | | | | | | | | | Misc.-g)(2) new term to explain that L001 is existing EU per 40 CFR §63.461. |
| L001 | App. B to 40 CFR Part 63, Subpart T; C.1.b)(1)d. | NA | 40 CFR 63.1-63.15General Provisions | N | N | Y | N | Y | Y | Y | N | N | See Appendix B to 40 CFR Part 63, Subpart T. |

# DRAFT

# Division of Air Pollution Control
# Title V Permit
for
HELICAL LINE PRODUCTS COMPANY

| | |
|---|---|
| Facility ID: | 0247030987 |
| Permit Number: | P0118668 |
| Permit Type: | Renewal |
| Issued: | 4/7/2016 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
HELICAL LINE PRODUCTS COMPANY

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# Authorization

| | |
|---|---|
| Facility ID: | 0247030987 |
| Facility Description: | Pole line hardware |
| Application Number(s): | A0053093 |
| Permit Number: | P0118668 |
| Permit Description: | Renewal of Title V Permit for a batch vapor degreaser used to remove lubricants from metal coils. |
| Permit Type: | Renewal |
| Issue Date: | 4/7/2016 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0106475 |

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

HELICAL LINE PRODUCTS COMPANY
659 MILLER ROAD
Avon Lake, OH 44012

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

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

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

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

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

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

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11)))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. 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 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 Ohio EPA DAPC, Northeast District Office 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

## 30. Submitting Documents Required by this Permit

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 ofan 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 Ohio EPA DAPC, Northeast District Office, 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 Responsible Official may be represented as provided through procedures established in Air Services.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. **The following emissions unit(s) is subject to 40 CFR Part 63, Subpart T - National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning**:

   L001 - Open top vapor degreaser using trichloroethylene (TCE).

   The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District Office.

   [Authority for term: 40 CFR Part 63, Subpart T]

3. **40 CFR Part 63, Subpart T – Facility-wide Emission Limit(s)** -The permittee shall ensure that the total emissions of perchloroethylene (PCE), trichloroethylene (TCE), and methylene chloride (MC) used at the affected facility are equal to or less than the applicable facility-wide 12-month rolling total emission limit presented in Table 1 of 40 CFR 63.471, and as determined using the procedures in paragraph 40 CFR 63.471(c).

| Table 1—Facility-wide Emission Limits for Facilities With Solvent Cleaning Machines | | |
|---|---|---|
| Solvents emitted | Facility-wide annual emission limits in kg for general population degreasing machines | Facility-wide annual emission limit in kg for military depot maintenance facilities |
| PCE only[a] | 4,800 | 8,000 |
| TCE only | 14,100 | 23,500 |
| MC only | 60,000 | 100,000 |
| Multiple solvents - Calculate the MC-weighted emissions using equation 1 | 60,000 | 100,000 |

Note a - PCE emission limit calculated using CalEPA URE.

   The permittee must comply with but is not limited to the facility-wide emission limits identified in the following limit in Table 1 to 40 CFR Part 63, Subpart T including any revisions or amendments: 14,100 kg TCE/year; or in the event that multiple solvents are employed 60,000 kg HAP/year as an MC-weighted average.

   [Authority for term: 40 CFR 63.471(b)(2)]

   **40 CFR Part 63, Subpart T – Facility-wide Monitoring and/or Recordkeeping Requirements**

4. The permittee shall maintain a log of solvent additions and deletions for each solvent cleaning machine.

   [Authority for term: 40 CFR 63.471(b)(1)]

5. The permittee shall maintain the following records either in electronic or written form for a period of 5 years.
   a) the dates and amounts of solvent that are added to each solvent cleaning machine;

b) the solvent composition of wastes removed from each solvent cleaning machines as determined using the procedure described in paragraph 40 CFR 63.471(c)(3); and

c) calculation sheets showing how monthly emissions and the 12-month rolling total emissions from each solvent cleaning machine were determined, and the results of all calculations.

[Authority for term: 40 CFR 63.471(e)]

**40 CFR Part 63, Subpart T – Reporting Requirements**

6. In the event that an additional solvent cleaning machine or a replacement to the currently permitted machine(s) is installed and operated,the permittee shall submit an initial notification report to the Director containing the following information:

a) the name and address of the owner or operator of the affected facility;

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

c) a brief description of each solvent cleaning machine at the affected facility including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls;

d) the date of installation for each solvent cleaning machine; and

e) an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

[Authority for term: 40 CFR 63.471(f)]

7. In the event that an additional solvent cleaning machine or a replacement to the currently permitted machine(s) is installed and operated, the permittee shall submit to the Director an initial statement of compliance that shall include the following information:

a) the name and address of the owner or operator of the affected facility;

b) the address (i.e., physical location) of each solvent cleaning machine and facility ID number assigned with this permit; and

c) the results of the first 12-month rolling total emissions calculation.

[Authority for term:40 CFR 63.471(g)]

8. The permittee shall submit a solvent emission report at the end of every year containing the following requirements:

a) the average monthly solvent consumption for the affected facility in kilograms per month; and

b) the 12-month rolling total solvent emission estimates calculated each month using the method(s) described in B.11 and B.12.

This report can be combined with the annual report required in 40 CFR 63.468(f) and (g) into a single report for each facility.

[Authority for term: 40 CFR 63.471(h)]

**40 CFR Part 63, Subpart T – Facility-wide Testing Requirements**

9. On the first operating day of every month, the permittee shall demonstrate compliance with the applicable facility-wide emission limit on a 12-month rolling total basis using the following procedures identified below for each solvent cleaning machine.

   a) On the first operating day of every month the permittee shall ensure that each solvent cleaning machine system contains only clean liquid solvent, which includes but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials.

   b) The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

   c) On the first operating day of the month, the permittee shall determine the total amount of halogenated HAP solvent removed ($SSR_i$) using one of the following methods:

      (1) tests conducted using EPA reference Method 25D - Determination of the Volatile Organic Concentration of Waste Samples, Appendix A-7, 40 CFR Part 60; or

      (2) engineering calculations included in the compliance report.

   d) Using the records of all solvent additions and deletions from the previous month, on the first operating day of each month, the permittee shall determine solvent emissions ($E_{unit}$) from each solvent cleaning machine using the following equation:

      $E_{unit} = SA_i - LSR_i - SSR_i$

      where:

      $E_{unit}$ = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent month i, (kilograms of solvent per month) for each HAP (e.g. PCE, TCE and MC);

      $SA_i$ = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent month i, (kilograms of solvent per month);

      $LSR_i$ = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent month i, (kilograms of solvent per month); and

      $SSR_i$ = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in B.9.c), during the most recent month i, (kilograms of solvent per month).

[Authority for term:40 CFR 63.471(c)(1), (2) and (3)]

10. On the first operating day of the month, after 12 months of emissions data are available, the permittee shall determine the 12-month rolling total emissions, $ET_{unit}$, for the 12-month period ending with the most recent month using the following equation:

$$ET_{unit} = \sum_{j=1}^{12} E_{unit}$$

where:

$ET_{unit}$ = the total halogenated HAP solvent emissions over the preceding 12 months, (kilograms of solvent emissions per 12-month period) for each HAP (e.g. PCE, TCE and MC); and

$E_{unit}$ = halogenated HAP solvent emissions for each month (j) for the most recent 12 months (kilograms of solvent per month).

[Authority for term: 40 CFR 63.471(c)(4)]

11. On the first operating day of the month, after 12 months of emissions data are available, the permittee shall determine the facility-wide 12-month rolling total emissions, $ET_{facility}$, for the 12-month period ending with the most recent month using the following equation:

$$ET_{facility} = \sum_{j=1}^{i} ET_{unit}.$$

where:

$ET_{facility}$ = the total halogenated HAP solvent emissions over the preceding 12 months for all cleaning machines at the facility, (kilograms of solvent emissions per 12-month period) for each HAP (e.g. PCE, TCE and MC); and

$ET_{unit}$ = the total halogenated HAP solvent emissions over the preceding 12 months for each unit j, where i equals the total number of units at the facility (kilograms of solvent emissions per 12-month period).

[Authority for term: 40 CFR 63.471(c)(5)]

12. In the event that multiple solvents are employedthe permittee shall determine the facility-wide 12-month rolling total emission using the following equation:

Note: In the equation, the facility emissions of PCE and TCE are weighted according to their carcinogenic potency relative to that of MC.

WE = (PCE x A) + (TCE x B) + (MC)

where:

WE = weighted 12-month rolling total emissions in kg (lbs);

PCE = 12-month rolling total PCE emissions from all solvent cleaning machines at the facility in kg (lbs) as calculated in B.11;

A = 12.5, a weighting factor for PCE relative to the carcinogenic potency of MC;

TCE = 12-month rolling total TCE emission from all solvent cleaning machines at the facility in kg (lbs) as calculated in B.11;

B = 4.25, a weighting factor for TCE relative to the carcinogenic potency of MC; and

MC = 12-month rolling total MC emissions from all solvent cleaning machines at the facility in kg (lbs) as calculated in B.11.

If the applicable facility-wide emission limit in Table 1 of 40 CFR 63.471(b)(2) is not met, an exceedance shall have occurred. All exceedances shall be reported as required in 40 CFR 63.468(h).

[Authority for term: 40 CFR 63.471(b)(2) and (d)]

**Miscellaneous Requirements**

13. The application for renewal Title V Permit to Operate P0118668 includes only one solvent cleaning machine (L001) which employed only TCE solvent.

# C. Emissions Unit Terms and Conditions

## 1. L001, DEGREASER #1

**Operations, Property and/or Equipment Description:**

Open top vapor degreaser using trichloroethylene

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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)<br>(PTI 02-19646) | Volatile organic compound emissions [trichloroethylene (TCE)] shall not exceed 8.05 tons per year.<br><br>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T. |
| b. | OAC rule 3745-21-09(O)(3) | In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3475-21-09(O)(3) shall not apply to this emissions unit.<br><br>See b)(2)a. |
| c. | 40 CFR Part 63, Subpart T<br>(40 CFR 63.460 – 63.471 and Appendices A & B) | Trichloroethylene emissions shall not exceed 150 kg/m²/month, as a 3-month rolling average.<br><br>See b)(2)b through b)(2)d. |
| d. | 40 CFR 63.1 – 63.15 | Appendix B to Subpart T of 40 CFR Part 63 - General Provisions Applicability to Subpart T shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply. |

(2) Additional Terms and Conditions

a. The rule citation reflects the exemption in OAC rule 3745-21-09(O)(6)(b) for solvent metal cleaning operations subject to federal MACT standards under 40

CFR Part 63, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-21-09(O)(6)(b)]

b. The permittee shall ensure the solvent cleaning machine contains only clean liquid solvent on the first day of every month and is filled to the same fill-line. The monthly emissions shall be calculated using the records of all solvent additions, deletions, and recoveries from each month.

[Authority for term: 40 CFR 63.464(a)(1)]

c. The permittee shall maintain a log of solvent additions and deletions (removals**)** for the solvent cleaning machine.

[Authority for term: 40 CFR 63.464(a)(1), 40 CFR 63.471(b)(1) and PTI 02-19646]

d. The permittee shall ensure that the monthly emissions of TCE from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms per square meter per month. (This is equivalent to 1341.4 pounds TCE/month, based on a 3-month rolling average.)

[Authority for term: 40 CFR 63.464(a)(1), 40 CFR 63.471(b)(2) and PTI 02-19646]

c) Operational Restrictions

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

[Authority for term: 40 CFR 63.465(b)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the dates and amounts, in gallons, of solvent that are added to the solvent cleaning machine;

b. the dates and amounts, in gallons, of waste that is removed from the solvent cleaning machine;

c. the solvent composition of wastes removed from the cleaning machines using the procedures described in f)(1); and

d. calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of TCE from the solvent cleaning machine were determined, as described in f)(1)a, and the results of all calculations.

[Authority for term: 40 CFR 63.467(c) and PTI 02-19646]

(2) The permittee shall maintain an annual record of the number of gallons of TCE used and the density (pounds per gallon). The permittee shall also record the amount of waste solvent sent off-site to a waste treatment facility.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19646]

e) Reporting Requirements

(1) The permittee shall submit an exceedance report on a semiannual basis. If the trichloroethylene 3-month rolling average of 150 kilograms/m²/month is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) the emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Ohio EPA, Northeast District Office) 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 by the 30$^{th}$ 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) or with alternative emission limit per 40 CFR 63.464, 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; and

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

[Authority for term: 40 CFR 63.468(h), OAC rule 3745-77-07(C)(1) and PTI 02-19646]

(2) The permittee shall submit an annual solvent emission report by February 1 of each year, which shall cover the previous calendar year, and shall contain the following information:

a. the size and type of the solvent cleaning machine, including if it has a solvent/air interface area or is using cleaning capacity;

b. the average monthly solvent consumption for the solvent cleaning machine in kilograms per month;

c. the 3-month monthly rolling average HAP emission estimates, calculated each month using the method as described in the standard and/or in f)(1)a; and

d. the annual total VOC emissions from this emissions unit calculated as described in f)(1)b.

[Authority for term: 40 CFR 63.468(g)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall ensure that the monthly emissions of TCE from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms per square meter per month.

Applicable Compliance Method:

Compliance may be based on the following equations:

i. Using the records of all solvent additions and deletions from the previous month, the permittee shall calculate the monthly emissions:

$E_i = (SA_i - LSR_i - SSR_i)/AREA_i$.

where:

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

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

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

$LSR_i$ = $Volume_{LIQUID\ WASTE}$ x Solvent Content of Liquid Waste

x$Density_{TCE}$ x $kg_{TCE}$/2.2046 $lbs_{TCE}$

Solvent Content of Liquid Waste = 0.80 gal TCE/$gal_{LIQUID\ WASTE}$, per an engineering estimate as noted in the application for P0118668. The permittee may determine the solvent content of the liquid waste from tests conducted using U.S. EPA Reference Method 25D - Determination of the Volatile Organic Concentration of Waste Samples, Appendix A-7, 40 CFR Part 60.

$Density_{TCE}$ = 12.09 $lb_{TCE}/gal_{TCE}$as noted in the application for P0118668.

$SSR_i$ = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, during the most recent monthly reporting period i (kilograms of solvent per month). The permittee may determine $SSR_i$ from tests conducted using U.S. EPA Reference Method 25D or from engineering calculations included in the compliance report.

$AREA_i$ = the solvent/air interface area of the solvent cleaning machine (square meters). The AREA of L001 was estimated to be 4.05 $m^2$ (43.6 $ft.^2$ x 0.0929 $m^2/ft.^2$) as noted in the application for P0118668.

ii. The permittee shall determine the monthly rolling average emissions, EA, for the 3-month period ending with the most recent month's reporting period using the following equation:

$$EA_i=[\sum_{j=i-2}^{i} E_i]/3 = \frac{\sum(E_{i-2}+E_{i-1}+E_i)}{3}$$

where:

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

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

j = i - 2 = the monthly reporting period two months prior to the recent reporting period;

j = i -1 = the monthly reporting period one month prior to the recent reporting period; and

j = i = the recent monthly reporting period.

[Authority for term: 40 CFR 63.465(c)]

b. <u>Emission Limitation</u>:

Volatile organic compound emissions [trichloroethylene (TCE)] shall not exceed 8.05 tons per year.

Applicable Compliance Method:

To determine the actual, annual volatile organic compound emission rate, the following equation may be used:

$$E = \left[\sum_{i=1}^{12} L_{A\,i} - \sum_{i=1}^{12}(L_{W\,i} \times Solvent\ Content\ of\ Waste_i)\right]\frac{lbs\ VOC}{year}$$

$$\times D \times \frac{ton\ VOC}{2000\ lbs\ VOC}$$

where:

E = the total volatile organic compound emission rate in tons per year.

$\sum L_{Ai}$ = the summation of the total liquid volume of cleaning solvent added each year, in gallons, based upon the record keeping requirements in d)(1).

$\sum L_{Wi}$ = the summation of the total liquid volume, in gallons, of waste removed from the solvent cleaning machine, based upon the record keeping requirements in d)(1).

Solvent Content of Liquid Waste = 0.80 gal TCE/$gal_{LIQUID\ WASTE}$, per an engineering estimate as noted in the application for P0118668. The permittee may determine the solvent content of the liquid waste from tests conducted using U.S. EPA Reference Method 25D - Determination of the Volatile Organic Concentration of Waste Samples, Appendix A-7, 40 CFR Part 60.

D = density of cleaning solvent, lbs./gal., which is 12.09 $lbs_{TCE}/gal_{TCE}$ as noted in the application for P0118668.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19646]

c. Emission Limitation:

Facility-wide emissions potential

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:

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). The PTE of L001 ($PTE_{L001}$) was estimated to be 69,182.1 kg TCE/year (76.3 tons TCE/year). (69,182.1 kg TCE/year x 2.2046 $lbs_{TCE}/kg_{TCE}$ x ton TCE/2000 lbs TCE = 76.3 tons TCE/year.)

$H_i$ = hours of operation for solvent cleaning machine i (hrs/year), which is 8760 hrs/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 (e.g. L001).
= 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), which is estimated to be 4.05 $m^2$ (43.6 $ft^2$).

[Authority for term: 40 CFR 63.465(e)]

g) Miscellaneous Requirements

(1) The installation of L001 was completed circa 3/01/1991 and is classified as a new source, as defined in OAC rule 3745-31-01. Permit to Install (PTI) 02-16443, issued on 7/30/2002, was for the original installation. The VOC emissions, which are air contaminants or precursors of an air contaminant for which a national ambient air quality standard has been adopted under the Clean Air Act, are subject to the Ohio Best Available Technology requirements in accordance with OAC rule 3745-31-05(A)(3). Corrected values for the length and width of the top opening of the solvent/air interface were made in the application for PTI 02-19646, issued on 12/21/2004, for an administrative modification to increase the allowable, annual VOC emissions for L001 by 0.67 ton from 7.38 tons to 8.05 tons. There was no change in operations at L001 so that no Chapter 31 modification, as defined in OAC rule 3745-31-01, occurred.

(2) According to 40 CFR 63.461, L001 is an existing solvent cleaning machine since the construction or reconstruction was commenced on or before November 29, 1993.