



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 16-02068

DATE: 11/28/2000

Russell Products Co Inc Falholt Div
Tom Allen
275 N Forge St
Akron, OH 44304

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA ARAQMD WV PA Akron Metro Area Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 16-02068

Application Number: 16-02068
APS Premise Number: 1677010983
Permit Fee: **To be entered upon final issuance**
Name of Facility: Russell Products Co Inc Falholt Div
Person to Contact: Tom Allen
Address: 275 N Forge St
Akron, OH 44304

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1066 Home Ave
Akron, Ohio**

Description of proposed emissions unit(s):
Open top batch halogenated solvent vapor degreaser (replacement unit)

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Russell Products Co Inc Falholt Div

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	2.79

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
new, open top, halogenated solvent vapor degreaser (replacement unit for L001 initially permitted under application #16-1846)	OAC rule 3745-31-05	2.79 tons/year of organic compounds [See Sections A.2.b and B.1 below for additional requirements of OAC rule 3745-31-05]
	40 CFR Part 63, Subpart T	The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine do not exceed 150 kilograms/square meter/month (30.7 pounds/square foot/month) based on a rolling, 3-month average. [See Section A.2.a below]
	OAC rule 3745-21-09(O)	The control measures required by OAC rule 3745-21-09(O) are equal to or less stringent than the control measures established in accordance with 40 CFR Part 63, Subpart T.

2. Additional Terms and Conditions

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

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- (b) refrigerated chiller;
- (c) enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);
- (d) carbon adsorption system, with ventilation greater than or equal to fifty cubic feet per minute per square foot of air/solvent interface (when cover is open), and exhausting less than twenty-five parts per million of solvent averaged over one complete adsorption cycle; or
- (e) a control system, demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the Director.

B. Operational Restrictions

1. Pursuant to the BAT requirements for new sources, as covered under OAC rule 3745-31-05, the permittee shall operate and maintain the open top vapor degreaser in accordance with the following good engineering practices to minimize solvent evaporation from the unit:
 - a. keep the cover closed at all times except when processing work loads through the degreaser;
 - b. minimize solvent carryout by:
 - i. racking parts so that solvent drains freely and is not trapped;
 - ii. moving parts in and out of the degreaser at less than eleven feet per minute.
 - iii. holding the parts in the vapor zone at least thirty seconds or until condensation ceases, whichever is longer.
 - iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
 - v. allowing parts to dry within the degreaser for at least fifteen seconds or until visually dry, whichever is longer;
 - c. clean only materials that are neither porous nor absorbent;
 - d. occupy no more than one-half of the degreaser's open-top area with a workload;
 - e. always spray within the vapor level;
 - f. repair solvent leaks immediately, or shut down the degreaser;

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- g.** store waste solvent only in covered containers;
- h.** operate the cleaner such that water cannot be visually detected in solvent exiting the water separator;
- i.** use no ventilation fans near the degreaser opening;
- j.** when the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet/minute, as measured between three and six feet upwind and at the same elevation as the tank lip;
- k.** if a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds sixty five cubic feet/minute/square foot of degreaser open area, unless a higher rate is necessary to meet occupational safety and health administration requirements; and
- l.** provide permanent, conspicuous label, summarizing the operating procedures.

C. Monitoring and/or Recordkeeping Requirements

- 1.** The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.
- 2.** The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 150 kilograms/square meters/month on a monthly basis as follows:
 - a.** the permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations; and
 - b.** the permittee shall on the first operating day of the month comply with the following:
 - i.** using the records of solvent additions and removals for the previous monthly reporting period, determine trichloroethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit;
 - ii.** determining the total amount of trichloroethylene removed from the solvent

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cleaning machine in solid waste during the most recent monthly reporting period (kilograms of solvent per month) as specified in the "Testing Requirements" section of this permit; and

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

3. The permittee shall maintain the following records either in electronic or written form for a period of five years:
 - a. the dates and amounts of trichloroethylene that are added to the solvent cleaning machine;
 - b. the trichloroethylene composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit; and
 - c. calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.

D. Reporting Requirements

1. The permittee shall submit an initial statement of compliance *no later than 150 days after startup*. Each initial statement of compliance shall contain the following:
 - a. the name and address of the permittee of the solvent cleaning machine;
 - b. the address (i.e., physical location) of the solvent cleaning machine;
 - c. the solvent/air interface area for the solvent cleaning machine; and
 - d. the results of the first 3-month average of trichloroethylene emission calculations.
2. The permittee shall submit an annual solvent emission report by February 1 of each year. The report shall cover the previous calendar year. The report shall contain the following:
 - a. the size (solvent/air interface area) and type of the solvent cleaning machine;
 - b. the average monthly trichloroethylene consumption for the solvent cleaning machine in kilograms per month; and
 - c. the 3-month monthly rolling average trichloroethylene emissions estimates calculated each month using the method as described in the "Testing Requirements" section of this permit.

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3. The permittee shall submit an exceedance report on a semiannual basis. If the trichloroethylene three-month rolling average of 150 kilograms/square meter/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 (appropriate District Office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
 - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
 - b. if no exceedance has occurred, a statement to that effect shall be submitted.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. MACT Compliance Provisions:
 - a. The permittee shall on the first operating day of every month:

Ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soil. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions as specified below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
 - b. Comply with the following requirements:

Using the records of all solvent additions and removals for the 3 previous monthly reporting periods required in section C of this permit, determine solvent emissions (Ei)

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using the equation below for cleaning machines with a solvent/air interface:

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

where:

E_i = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i (pounds of solvent per square foot 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 (pounds 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 (pounds of solvent per month);

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

$AREA_i$ = the solvent /air interface area of the solvent cleaning machine (square feet).

Determine SSR_i from tests conducted using reference method 25d or from engineering calculations included in the compliance report.

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

$$EA_i = (\sum_{j=1}^3 E_j) / 3, \text{ where the summation is from } j = 1 \text{ to } j = 3$$

where:

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

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

$j = 1$ = the most recent monthly reporting period.

$j = 2$ = the monthly reporting period immediately prior to $j = 1$.

$j = 3$ = the monthly reporting period immediately prior to $j = 2$.

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- c. 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 the solvent cleaning machine shall be determined in accordance with the following equation:

$$\text{PTE} = H \times W \times \text{SAI}/2000$$

where:

PTE = 26.4 tons/year, the potential to emit for the solvent cleaning machine, in tons/year of solvent;

H = 8760 hours/year of operation for the solvent cleaning machine;

W = 0.399 pound/square foot/hour, the working mode uncontrolled emission rate; and

SAI = 15.1 square feet, the solvent/air interface area of the solvent cleaning machine.
40 CFR 63.461 defines the solvent/air interface area.

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2. Special Compliance Provisions:

- a.** This facility shall determine the concentration of the solvent(s) used in the cleaning machine in accordance with the methods and procedures specified in OAC rule 3745-21-10, or using material safety data sheets, or engineering calculations.
- b.** Compliance with the 2.79 tons/year organic compound emission limit shall be based upon the records of average monthly OC emissions as determined according to the "MACT Compliance Provisions" section above.

F. Miscellaneous Requirements

- 1.** This facility is subject to Title V permitting requirements and may be exempt by the State from applying for a Part 70 permit until 42 months after the State's Part 70 program is approved by USEPA. Another date may be established to assure that subject sources obtain a permit by 5 years after a Part 70 program is approved.