



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

6/21/2016

Certified Mail

KEVIN DEIGHAN  
 W S TYLER  
 8570 TYLER BLVD  
 MENTOR, OH 44060

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0243081244  
 Permit Number: P0120337  
 Permit Type: Renewal  
 County: Lake

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
W S TYLER**

Facility ID:	0243081244
Permit Number:	P0120337
Permit Type:	Renewal
Issued:	6/21/2016
Effective:	6/21/2016
Expiration:	6/21/2026





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

for  
W S TYLER

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. K001, Devilbiss Dry Filter Paint Booth.....	11
2. L002, Vapor Degreaser.....	16





**Final Permit-to-Install and Operate**  
W S TYLER  
**Permit Number:** P0120337  
**Facility ID:** 0243081244  
**Effective Date:** 6/21/2016

## Authorization

Facility ID: 0243081244  
Application Number(s): A0053756, A0055869  
Permit Number: P0120337  
Permit Description: First-issue PTIO to transition facility out of Title V (L002 vapor degreaser will now utilize n-propyl bromide and K001 will also be operating under the PTIO).  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 6/21/2016  
Effective Date: 6/21/2016  
Expiration Date: 6/21/2026  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

W S TYLER  
8570 TYLER BLVD  
Mentor, OH 44060

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## **Authorization (continued)**

Permit Number: P0120337

Permit Description: First-issue PTIO to transition facility out of Title V (L002 vapor degreaser will now utilize n-propyl bromide and K001 will also be operating under the PTIO).

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

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**K001**

Devilbiss Dry Filter Paint Booth

P0116180

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**L002**

Vapor Degreaser

P0109666

Not Applicable



**Final Permit-to-Install and Operate**  
W S TYLER  
**Permit Number:** P0120337  
**Facility ID:** 0243081244  
**Effective Date:** 6/21/2016

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
W S TYLER  
**Permit Number:** P0120337  
**Facility ID:** 0243081244  
**Effective Date:** 6/21/2016

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



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



**Final Permit-to-Install and Operate**  
W S TYLER  
**Permit Number:** P0120337  
**Facility ID:** 0243081244  
**Effective Date:** 6/21/2016

## **C. Emissions Unit Terms and Conditions**

**1. K001, Devilbiss Dry Filter Paint Booth**

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

Devilbiss Dry Filter Paint Booth. 10 x 10 Paint Booth. Cup Air Gun. Lacquer Coating of Small Parts in a Paint Booth.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 22.2 pounds per day from coatings and 4.55 tons per year, including both coatings and cleanup materials.</p> <p>Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings.</p> <p>See c)(1).</p> <p>Compliance with the requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-09(U)(1) and OAC rule 3745-17-07(A)(1).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short-term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
- b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating employed, in pounds per gallon, as applied;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed; and
  - e. the total VOC emissions from all the coatings employed, in pounds [i.e., the sum of d)(2)b times d)(2)c for each coating employed].
- (3) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;

- c. the VOC content of each cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of d)(3)b times d)(3)c for each cleanup material employed];
  - e. the amount of cleanup material recovered, in pounds; and
  - f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., d)(3)d –d)(3)e].
- (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(2) plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(3)].
- e) Reporting Requirements
- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
  - (2) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or Local air agency) within 30 days after the exceedance occurs.
  - (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- 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:  
VOC emissions shall not exceed 22.2 pounds per day from coatings.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)e.

b. Emission Limitation:

VOC emissions shall not exceed 4.55 tons per year, including both coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4).

c. Emission Limitation:

PE shall not exceed 0.551 pound per hour from coatings.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

PE shall not exceed 2.4 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

e. Emission Limitation:

The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)d.

f. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with this visible particulate emission limitation shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.

**2. L002, Vapor Degreaser**

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

Open Top Vapor Degreaser using n-propyl bromide as the degreasing agent.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The requirements of OAC rule 3745-31-05(A)(3) are equivalent to the emission limitation specified under OAC rule 3745-31-05(E).  See b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC emissions from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E).  See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	Volatile organic compound (VOC) emissions shall not exceed 0.28 ton per month, averaged over a rolling, 12-month period.  See b)(2)d.
d.	OAC rule 3745-21-09(O)(3)	See b)(2)e, b)(2)f, c)(1), d)(1), d)(2) and e)(3).

(2) Additional Terms and Conditions

- a. The degreasing solvent employed in this batch cleaning machine is n-propyl bromide (nPB).
- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. The permittee has taken a voluntary restriction on the amount of nPB employed by this emissions unit. Annual nPB usage shall not exceed 1,320 gallons per year.
- e. The open top vapor degreaser shall be equipped with and shall employ a cover and safety switches as described below:
  - i. The cover shall be installed so that it can be opened and closed easily without disturbing the vapor zone.
  - ii. A condenser flow switch and thermostat (or other such device) shall shut off the sump heat if the condenser coolant is either not circulating or too warm.
  - iii. If using a spray application, a spray safety switch shall shut off the spray pump if the vapor level drops below any fixed spray nozzle.
  - iv. A vapor level control thermostat (or other such device) shall shut off the sump heat when the vapor level rises too high.

- v. A water flow switch or water pressure switch (or other such device) shall shut off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.
- f. The refrigerated chiller shall be operated to control the temperature of the solvent used in the open top vapor degreaser during cleaning operations.

c) Operational Restrictions

- (1) The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. The cover shall be kept closed at all times except when processing work-loads through the degreaser.
  - b. Solvent carry-out shall be minimized by:
    - i. racking parts so that solvent drains freely and is not trapped;
    - ii. moving parts in and out of the degreaser at less than 11 feet per minute;
    - iii. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
    - iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
    - v. allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
  - c. Porous and/or absorbent materials shall not be cleaned.
  - d. Workloads shall occupy no more than one-half of the degreaser's open-top area.
  - e. Solvent spraying shall only be conducted within the vapor level.
  - f. Solvent leaks shall be repaired immediately, or the degreaser shall be shut down.
  - g. Solvent waste shall only be stored in covered containers.
  - h. The degreaser shall be operated so that water cannot be visually detected in solvent exiting the water separator.
  - i. No ventilation fans shall be used near the degreaser opening.
  - j. When the cover is open, the open top vapor degreaser shall not be exposed to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip.
  - k. If a lip exhaust is used on the open top vapor degreaser, the ventilation rate shall not exceed 65 cubic feet per minute per square foot of degreaser open area,

unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.

- I. A permanent, conspicuous label, summarizing the operating procedures shall be posted on or near to the degreaser.
- (2) Only degreasing solvents which are not hazardous air pollutants (HAPs) shall be used in this emissions unit. "Hazardous air pollutant" means any pollutant listed under Section 112(b) of the federal Clean Air Act of 1990.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records of the following information:
    - a. the types of solvents employed in the open top vapor degreaser, including the chemical name(s) and concentration(s);
    - b. all maintenance conducted on the refrigerated chiller, including the date and activity;
    - c. the temperature (or temperature range) at which each cleaning solvent is maintained; and
    - d. monthly visible inspections to determine if covers are opening and closing properly, the enclosure(s) completely cover the degreaser when closed, and the entire enclosure is free of cracks, holes and other defects.
- These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (2) The permittee shall maintain records of the following information, collected at the end of each month:
    - a. the total cleaning solvent added to the open top vapor degreaser or the amount purchased for use in the emissions unit during the year;
    - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year;
    - c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year; and
    - d. the estimated monthly VOC emissions from this emissions unit, averaged over a 12-month rolling period.
- e) **Reporting Requirements**
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall include in the annual PER information documenting any period of time during which the refrigerated chiller was not in operation during cleaning operations, and/or any period of time during which the open top vapor degreaser was not operated and maintained, and/or any period of time its solvent handled in accordance with the requirements of this permit, and/or any period of time the unit had solvent present with holes in the enclosure or door openings were left open outside of normal operations (parts loading and unloading), along with actions taken to correct the deviations mentioned above.

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:

VOC emissions shall not exceed 0.28 ton per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the average monthly emission limitation shall be demonstrated based upon the record keeping requirements specified in d)(2) and the following equation:

$$E = (L_s - L_w) \times D / 2,000 \text{ lbs}$$

where:

E = VOC emission rate, in tons per year;

L<sub>s</sub> = liquid volume of cleaning solvent employed each year (gallons);

L<sub>w</sub> = liquid volume of cleaning solvent sent off-site as waste (gallons); and

D = density of cleaning solvent (pounds/gallon).

The ton per year product (E) shall then be divided by 12 months to determine compliance with the monthly average emission limitation.

g) Miscellaneous Requirements

- (1) WST utilized 220 gallons of nPB in CY 2015. Of the 220 gallons utilized, 110 gallons were sent off-site for disposal. The remaining 110 gallons (half of that originally employed) were assumed to have been emitted.



The resultant emissions calculated from the loss of 110 gallons are as follows:

$$110 \text{ gallons/year} * 10 \text{ pounds/gallon} * 1 \text{ ton}/2,000 \text{ lbs} = 0.55 \text{ TPY VOC (as nPB)}$$

Through discussions with WST and taking into consideration actual usage information, the facility has agreed to an annual voluntary limitation on the amount of nPB employed to 1,320 gallons per year.

The resultant allowable emissions calculated from the loss of 660 gallons (half of 1,320) are as follows:

$$660 \text{ gallons/year} * 10 \text{ pounds/gallon} * 1 \text{ ton}/2,000 \text{ lbs} = 3.3 \text{ TPY VOC (as nPB)}$$