



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

9/28/2016

Certified Mail

DANILO VUJOVIC
 WESTERN ENTERPRISES - AVON LAKE
 33672 PIN OAK PKWY
 AVON LAKE, OH 44012

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0247030559
 Permit Number: P0121075
 Permit Type: Renewal
 County: Lorain

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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
WESTERN ENTERPRISES - AVON LAKE**

Facility ID:	0247030559
Permit Number:	P0121075
Permit Type:	Renewal
Issued:	9/28/2016
Effective:	9/28/2016
Expiration:	9/28/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
WESTERN ENTERPRISES - AVON LAKE

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Final Permit-to-Install and Operate
WESTERN ENTERPRISES - AVON LAKE
Permit Number: P0121075
Facility ID: 0247030559
Effective Date: 9/28/2016

Authorization

Facility ID: 0247030559
Application Number(s): A0056239
Permit Number: P0121075
Permit Description: Renewal FEPTIO for L003, an open-top trichloroethylene vapor degreaser with a freeboard ratio of 1.5, and P001, a decorative trivalent chromium plating line controlled with a wetting agent/fume suppressant.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/28/2016
Effective Date: 9/28/2016
Expiration Date: 9/28/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

WESTERN ENTERPRISES - AVON LAKE
33672 PIN OAK PKWY
AVON LAKE, OH 44012

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



Final Permit-to-Install and Operate
WESTERN ENTERPRISES - AVON LAKE
Permit Number: P0121075
Facility ID: 0247030559
Effective Date: 9/28/2016

Authorization (continued)

Permit Number: P0121075

Permit Description: Renewal FEPTIO for L003, an open-top trichloroethylene vapor degreaser with a freeboard ratio of 1.5, and P001, a decorative trivalent chromium plating line controlled with a wetting agent/fume suppressant.

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

Emissions Unit ID:	L003
Company Equipment ID:	vapor degreasing
Superseded Permit Number:	P0107973
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	chrome plating
Superseded Permit Number:	P0107973
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
WESTERN ENTERPRISES - AVON LAKE
Permit Number: P0121075
Facility ID: 0247030559
Effective Date: 9/28/2016

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
WESTERN ENTERPRISES - AVON LAKE
Permit Number: P0121075
Facility ID: 0247030559
Effective Date: 9/28/2016

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).
 - (1) 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.
 - (a) None.
 - (2) 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.
 - (a) None.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart T, National Emissions Standards for Halogenated Solvent Cleaning: L003. The complete requirements (including the Part 63 General Provisions) may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://www.ecfr.gov/> or by contacting the Ohio EPA Northeast District Office.

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart T. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Appendix B of 40 CFR Part 63, Subpart T. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart T, and Subpart A.
3. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart N, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks: P001. The complete NESHAP requirements (including the Part 63 General Provisions) may be accessed via the internet from the e-CFR website at <http://www.ecfr.gov/> or by contacting the Ohio EPA Northeast District Office.

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart N. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart N. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart N, and Subpart A.
4. The Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63, Subpart WWWW, NESHAP: Area Source Standards for Plating and Polishing Operations. At this time, the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that area applicable to the area source for hazardous air pollutants identified in this permit, shall be enforceable by U.S. EPA, Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the e-CFR website <http://www.ecfr.gov/> or by contacting the Ohio EPA Northeast District Office.



Final Permit-to-Install and Operate
WESTERN ENTERPRISES - AVON LAKE
Permit Number: P0121075
Facility ID: 0247030559
Effective Date: 9/28/2016

C. Emissions Unit Terms and Conditions



1. L003, vapor degreasing

Operations, Property and/or Equipment Description:

Ultrasonic open top vapor degreaser using trichloroethylene

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., c)(1), d)(1), e)(5)a., and f)(2)
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-14213	The requirements of this rule are equivalent to OAC rule 3745-31-05(D). The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
b.	OAC rule 3745-31-05(D) Federally enforceable restriction to avoid major source permitting for HAPs.	Emissions of VOCs (trichloroethylene) shall not exceed 5.1 tons per rolling, 12-month period.
c.	OAC rule 3745-21-09(O)	In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart T	The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ a freeboard refrigeration device and freeboard ratio of 1.0, as the chosen control combination selected from Table 1 of Subpart T. See b)(2)a. below.
e.	40 CFR Part 63, Subpart A	Appendix B of 40 CFR Part 63, Subpart T – General Provisions Applicability to Subpart T – shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
 - i. the vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils (this requirement does not apply if the emissions unit uses steam to heat the solvent);
 - ii. the vapor cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser;
 - iii. the vapor cleaning machine shall have a primary condenser;
 - iv. the solvent cleaning machine’s automated parts handling system shall move the parts or parts basket at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed), from the initial loading of parts through removal of cleaned parts; and
 - v. the permittee shall use an idling and downtime mode cover, that shall be in place during the idling mode and during the downtime mode, unless either the solvent has been removed or maintenance or monitoring is being performed that requires the cover(s) to be removed.

c) Operational Restrictions

- (1) The maximum annual solvent (trichloroethylene) usage for this emissions unit shall not exceed 840 gallons, based upon a rolling, 12-month summation of the solvent usage figures.

- (2) The permittee shall meet the following required work and operational practices:
- a. the solvent cleaning machine's automated parts handling system shall move parts or baskets at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed);
 - b. during startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;
 - c. during shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
 - d. when solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
 - e. the solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA Northeast District Office to achieve the same or better results as those recommended by the manufacturer;
 - f. waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container;
 - g. sponges, fabric, wood, paper products and/or other porous or absorbent material shall not be cleaned;
 - h. the parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less;
 - i. any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
 - j. parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA Northeast District Office; and
 - k. parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - l. Each operator of the solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Subpart T, Appendix A, if requested during an inspection by the Ohio EPA Northeast District Office;

- (3) The permittee shall comply with the following requirements:
- a. control air disturbances across the solvent cleaning machine by using an idling and downtime mode cover, that shall be in place during the idling and downtime modes, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed. The cover shall be able to be readily opened or closed, shall completely cover the cleaning machine openings when in place, and shall be free of cracks, holes, and other defects;
 - b. ensure that the cover is in place whenever parts are not in the solvent cleaning machine and it completely covers the cleaning machine openings during downtime and during the idling mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements is/are being conducted. The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects;
 - c. ensure that the chilled air blanket temperature, measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point; and
 - d. maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
 - a. the solvent usage for each month; and
 - b. the rolling, 12-month summation of the solvent usage figures.
 - (2) Using a thermometer or thermocouple, the permittee shall measure and record, on a weekly basis, the temperature at the center of the air blanket during the idling mode.
 - (3) The permittee shall measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirements limitation. The date of record shall be included with the recorded measurements.
 - (4) The permittee shall conduct a monthly visual inspection of the idling-mode/downtime cover(s) and shall maintain a record of the results. The records shall document that the cover is opening and closing properly, that it completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - (5) The permittee shall monitor the hoist speed as described below and maintain records of the results:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

- b. The permittee shall document that the parts and parts basket does not occupy more than 50 percent of the solvent/air interface area, if the hoist speed exceeds 0.9 meters per minute (3 feet per minute). This determination shall be re-calculated if the parts or basket size increase.
 - c. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
 - d. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - e. If the permittee can demonstrate in the initial compliance report, and to the satisfaction of the Ohio EPA Northeast District Office, that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency may be quarterly, including during the first year of compliance.
- (6) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
- a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
 - b. records of the halogenated hazardous air pollutant (HAP) solvent content for each solvent used in the solvent cleaning machine; and
 - c. the date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - d. records of the tests required as specified in d)(5).
- (7) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
- a. the results of the control device monitoring required in this permit;
 - b. information on the actions taken to comply with 40 CFR 63.463, including the control equipment, the required monitoring parameters, records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
 - c. estimates of annual solvent consumption for the solvent cleaning machine.
 - d. estimates of annual trichloroethylene waste removed from the solvent cleaning machine.

- (8) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:
- a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
 - c. the primary condenser.

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

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the 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 signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit an annual report by February 1 of each year, following the year for which the report is being made. This report shall contain the following information:
 - a. a signed statement, by the facility owner or his designee, stating that “all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard”; and
 - b. an estimate of solvent consumption during the reporting period and emissions of each HAP.

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

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

- a. if the cover did not completely cover the cleaning machine openings, when containing the HAP solvent and during any idling or downtime mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements were being conducted. Cracks, holes or other defects to the cover, that were not repaired or the cover not replaced within 15 days of detection, shall also be reported;
- b. if the temperature of the chilled air blanket, measured at its center, was greater than 30% of the solvent's boiling point and was not adjusted within 15 days of detection; and
- c. if the freeboard ratio is not maintained at 1.0 or greater.

Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following information:

- a. if an exceedance has occurred, the standard, monitored parameter, emission limit, or other requirement that was exceeded; the reason for the exceedance; and the actions taken to correct any future exceedance of the same limit or requirement;
 - b. 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
 - c. if no exceedance has occurred, a statement to that effect shall be submitted.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all exceedances of the rolling, 12-month emission limitation;
- b. if monthly (or quarterly if adjusted after the first year) measurements and records are not maintained of the speed of the solvent cleaning machine's automated parts handling system, or if these measurements exceed 3.4 meters per minute (11 feet per minute);
- c. if any of the following control equipment is not repaired or replaced within 15 days of any malfunction, and/or the machine is not shut down until repaired:
 - i. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - ii. the vapor level control device(s) that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
 - iii. the primary condenser.

The reports shall also include:

- a. the probable cause of each deviation (excursion);
- b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);
- c. the magnitude and duration of each deviation (excursion); and
- d. the length of time the equipment specified in e)(5)c. above was not in operation or was malfunctioning, and the date it was repaired or replaced.

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

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

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:

Emissions of VOCs (trichloroethylene) shall not exceed 5.1 TPY.

Applicable Compliance Method:

To determine the actual VOC emission rate, the following equation shall be used:

$$E = (L_s - L_w) \times D / 2000$$

where:

E = VOC emission rate (TPY);

L_s = liquid volume of cleaning solvent employed each year (gallons);

L_w = liquid volume of cleaning solvent sent off-site as waste (gallons); and

D = density of cleaning solvent (lb/gal).

b. Emission Limitation:

Emissions of VOCs (trichloroethylene) shall not exceed 5.1 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in d)(5).

- (2) It is not required that the permittee determine the potential to emit for emissions unit L003 using the equation found in 40 CFR 63.465 since this permit is limiting the potential emissions to 5.1 tons of VOC per rolling, 12-month period.

g) **Miscellaneous Requirements**

- (1) The permittee has submitted an initial notification report in accordance with 40 CFR 63.468(b).
- (2) The permittee has submitted an initial statement of compliance in accordance with 40 CFR 63.468(d).
- (3) All VOCs emitted from this source (emissions unit L003) are HAPs as defined in Section 112(b) of the Clean Air Act.

2. P001, chrome plating

Operations, Property and/or Equipment Description:

Decorative trivalent chromium electroplating line

- 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)	The requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart N. See b)(2)a. below.
b.	OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)	The emission limitation required by this applicable rule is less stringent or equivalent to the emission limitation specified in 40 CFR Part 63, Subpart N.
d.	40 CFR Part 63, Subpart N	The permittee shall employ a wetting agent to the trivalent chromium bath. See b)(2)b. and b)(2)c. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart A	Table 1 of 40 CFR Part 63, Subpart N – General Provisions Applicability to Subpart N – shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a wetting agent.
- b. The wetting agent used in the decorative trivalent chromium bath shall be documented to be an ingredient in the bath component(s) as purchased from the vendor(s), or it shall be clearly identified as a constituent contained in one of the components of the bath.

If the permittee ceases to use a bath component containing a wetting agent as purchased from the vendor in the trivalent chromium bath, the permittee shall comply with the applicable emission limitation within one year of switching bath components. Within 30 days of the change, the permittee shall submit a report to notify the Ohio EPA Northeast District Office of the process change and the applicable limitation required by the rule, from 40 CFR 63.342.

- c. After 9/21/15 perfluorooctane sulfonic acid (PFOS)-based fume suppressants (containing 1% or greater PFOS by weight) shall not be used in decorative chromium electroplating tanks using a trivalent chromium bath.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In addition to fulfilling all recordkeeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also maintain the following records:
 - a. the total process operating time of the emissions unit during the reporting period;
 - b. all documentation supporting the notifications and reports as outlined in the "Reporting Requirements" section of this permit and the general reporting requirements in 40 CFR 63.9 and 40 CFR 63.10, from Subpart A and 40 CFR 63.347; and
 - c. records of the bath components purchased, with the wetting agent clearly identified as a bath constituent.

All records shall be maintained for a period of five years.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or “reported in writing” are to be submitted to Ohio EPA through the Ohio EPA’s eBusiness Center: Air Services web service (“Air Services”). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the 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 signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) Within 30 days of any change to the trivalent chromium electroplating process, the permittee shall submit a report that includes the following information:
 - a. a description of the manner in which the process has been changed and the emission limitation, if any, now applicable to the affected source;
 - b. the information required in the initial notification report, 40 CFR 63.347(C)(1), identifying the owner, address, and applicable limitation in Part 63, Subpart N; and
 - c. if no longer using a wetting agent as a component of the electroplating bath, the information contained in the the notification and reporting requirements of 40 CFR 63.347, including:
 - i. the notification of performance test in 63.347(d);
 - ii. the notification of compliance status in 63.347(e);
 - iii. the reports of performance test results in 63.347(f); and
 - iv. the ongoing compliance status reports in 63.347(g) and (h).

A decorative chromium electroplating tank that uses a trivalent chromium bath that incorporates a wetting agent, and that ceases using the trivalent chromium process within a wetting agent, must comply with the emission limitation applicable to the tank within 1 year of switching the bath components.

f) Testing Requirements

(1) The decorative trivalent chromium electroplating tank is not subject to the work practice requirements of 40 CFR 63.342(f) or the continuous compliance monitoring requirements for the surface tension found in 40 CFR 63.343(c) if the following requirements are met:

- a. the trivalent chromium bath is purchased with a wetting agent incorporated as a component of the trivalent chromium bath ingredients;
- b. the permittee maintains records of the bath components, with the wetting agent clearly identified as a bath constituent contained in one of the components; and
- c. the permittee submits an initial notification documenting that the trivalent chromium process incorporates a wetting agent to comply with 40 CFR 63.432(e) and the list of bath components that comprise the trivalent chromium bath with the wetting agent clearly identified.

(2) 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:

Chromium emissions shall not exceed 9.9×10^{-5} lb/hr and 4.3×10^{-3} TPY.

Applicable Compliance Determination:

Compliance with the hourly emission limitation shall be determined through the following equation:

$$E_a = (E_f) \times (R_c) \times (1 \text{ lb}/7000 \text{ grains}) \times (C_e)$$

$$E_a = (0.069 \text{ grains}/\text{A}\cdot\text{hr}) \times (1,000 \text{ A}) \times (1 \text{ lb}/7000 \text{ grains}) \times (1 - 0.99)$$

where:

E_a = actual annual chromium emissions (lb/hr)

E_f – emission factor for decorative chromium electroplating line (0.069 grains/A-hr)

R_c = maximum rectifier capacity in amps (1000 A)

C_e = control efficiency of wetting agent (99%)

The annual emissions limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.



b. Emission Limitation

Visible PE shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Determination:

If required, compliance shall be demonstrated based upon visible PE evaluations performed 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).

g) Miscellaneous Requirements

- (1) BAT had not been addressed in previous permits, however due to its installation in 1974, it was determined that BAT is applicable to this unit.