

Facility ID: 1677000049 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677000049 Emissions Unit ID: L002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Batch, Open top Vapor Degreaser	PTI # 16-982 OAC 3745-21-09 (O)(3) 40 CFR 63 (T)	See A.2.a below.

2. Additional Terms and Conditions

- (a) The emissions from this emissions unit shall not exceed the following:
 - i. 1650 pounds of methylene chloride per month; and
 - ii. 9.9 tons of methylene chloride per year.

B. Operational Restrictions

1. In accordance with OAC rule 3745-21-09(O)(3), the permittee shall:
 - a. equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - b. operate and maintain the open top vapor degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit;
 - c. install, maintain and operate a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser is either not circulating or too warm;
 - d. install, maintain and operate a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
 - e. install, maintain and operate a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and
 - f. install, maintain and operate a water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.
2. In accordance with 40 CFR 63 subpart (T), the permittee shall comply with one of the following:
 - a. employ one of the control combinations listed in table 1 of paragraph 63.463 of subpart T or other equivalent methods as determined in paragraph 63.469; or
 - b. demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter of solvent/air interface area using the procedures in paragraph 63.465(a) of subpart T.
3. Except as provided in paragraph 63.464, the permittee shall meet all of the following required work and operational practices that are applicable to the type of cleaner:
 - a. Control air disturbances across the machine opening by incorporating either (i) or (ii) of the following:
 - i. cover(s) to each solvent cleaning machine shall be in place during the idle mode, and during the downtime

mode unless either the solvent has been removed from the machine, or maintenance and monitoring is being performed that requires the cover(s) to not be in place; or

- ii. a reduced room draft as described in paragraph 63.463(e)(2)(ii).
- b. The parts baskets or parts being cleaned in an open top batch vapor cleaner shall not occupy more than 50 percent of the solvent/air interface area, unless the parts basket or parts are introduced at a speed of 0.9 meters per minute or less.
- c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the administrator.
- e. Parts or parts baskets shall not be removed from any solvent cleaning machine until dripping has stopped.
- f. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- g. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- h. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof coupling and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- i. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- j. Each operator of a solvent cleaning machine shall complete and pass the applicable section's test of the solvent cleaning operating procedures (in appendix B of 40 CFR part 63) if requested during an inspection by the Administrator.
- k. Waste solvent, still and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.

l. Sponges, fabric, wood, and paper products shall not be cleaned.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall conduct monitoring of each control device used to comply with paragraph 63.463 of subpart T. If a freeboard refrigeration device is used to comply with these standards, the permittee shall ensure that the chilled air blanket is no greater than 30 percent of the solvent's boiling point. If reduced room draft is used to comply with these standards, the permittee shall comply with the following requirements:
 - i. ensure the flow of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute at any time as measured using the procedures in paragraph 63.466(d); and
 - ii. establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute or less as described in paragraph 63.466(d).
If a working-mode cover is used to comply with these standards, the permittee shall ensure that the cover opens only for parts entrance and removal and completely covers the cleaning machine openings when closed, and is maintained free of cracks, holes and other defects.
If an idle-mode cover is used to comply with these standards, the permittee shall ensure that the cover is in place whenever parts are not in the solvent cleaning machine, completely covers the cleaner openings when in place, and is maintained free of cracks, holes and other defects.
If a dwell is used to comply with these standards, the permittee shall determine the appropriate dwell time for each part or parts basket or determine the maximum dwell time using the most complex part type or parts basket as described in paragraph 63.465(c); and ensure that, after cleaning, each part is held in the freeboard area of the solvent cleaning machine above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
If a superheated vapor system is used to comply with these standards, the permittee shall ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point. Also the permittee shall ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed, and that parts remain within the superheated vapor for at least that determined dwell time.
If a carbon adsorber in conjunction with a lip exhaust is used to comply with these standards, the permittee shall ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedures in 63.466(e). If this concentration is exceeded, the permittee shall adjust the desorption schedule or replace the disposal canister so that the concentration is brought below 100 parts per million. The permittee shall ensure that the carbon adsorber bed is not bypassed during desorption and that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level.
2. If any of the requirements of 1.a through 1.g above are not met, the permittee shall determine if an exceedance has occurred using the following criteria:
 - a. An exceedance has occurred if the requirements of 63.463(e)(2)(ii)(B), (iii)(A), (iv)(A), (v), (vi)(B), (vi)(B), (vi)(V), (vii)(B) or (vii)(C) have not been met.
 - b. An exceedance has occurred if the requirements of 63.463 (e)(3)(l), (ii)(A), (iii)(B), (iv)(B), (vi)(B), (vi)(B), or (vii)(A) have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be

made to the solvent cleaning system or control device to reestablish required levels and immediately remeasure the parameter to demonstrate that it is within required limits.

3. The permittee shall maintain records of the following, in written or electronic form, for the lifetime of the machine:
 - a. The owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, on or after 11/29/93.
 - c. If a dwell is used to comply with these standards, records of the tests required in paragraph 63.465(d) to determine an appropriate dwell time for each part or parts basket.
 - d. Each bath vapor or in-line solvent cleaning machine complying with the idling emission limits standards of 63.463(b)(1)(ii), (b)(2)(ii), (c)(1)(ii), or (c)(2)(ii) shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during that test.
 - e. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of subpart T.
4. The permittee shall maintain records of the following, in written or electronic form, for a period of five years:
 - a. The results of control device monitoring required under paragraph 63.466.
 - b. Information on the actions taken to comply with the provisions of paragraph 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
 - c. Estimates of annual solvent consumption for each solvent cleaning machine.
 - d. If a carbon adsorber is used, the records of the date and results of the weekly measurements of the halogenated HAP solvent concentration in the carbon absorber exhaust required in paragraph 63.466(e).
5. The permittee shall maintain records of the following, in written or electronic form, for a period of five years:
 - a. The dates and amount of solvent added to the solvent cleaning machine.
 - b. The solvent composition of wastes removed from cleaning machines as determined using the procedure in paragraph 63.465(c)(2).
 - c. Calculation sheets showing how monthly emissions from the solvent cleaning machine were determined, and the results of all calculations.

D. Reporting Requirements

1. The permittee shall submit an initial notification report to the Administrator which includes the following:
 - a. the name and address of the owner or operator;
 - b. the address (i.e., physical location) of the solvent cleaning machine(s);
 - c. a brief description of each solvent cleaning machine, including the machine type (i.e., batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls;
 - d. the date of installation of each solvent cleaning machine or a letter certifying that the cleaning machine and its control devices were installed prior to, on, or after 11/29/93;
 - e. the anticipated compliance approach for each solvent cleaning machine; and
 - f. an estimated annual halogenated HAP solvent consumption for each solvent cleaning machine.
1. The permittee shall submit to the Administrator, an initial statement of compliance for each solvent cleaning machine using one of the following applicable criteria:
 - i. for existing sources, the report shall be submitted no later than 150 days after the compliance date specified in paragraph 63.460; and
 - ii. for new sources, the report shall be submitted no later than 150 days after the startup date or 5/1/95, whichever is later.
The statement of compliance shall include the following:
 - i. the name and address of the owner or operator;
 - ii. the address (i.e. physical location) of the solvent cleaning machine(s);
 - iii. a list of the control equipment used to achieve compliance for each solvent cleaning machine;
 - iv. for each piece of control equipment required to be monitored, a list of the parameters which are monitored and the values of these parameters measured on or during the first month after the compliance date; and
 - v. if applicable, the conditions to maintain the wind speed requirements of 63.463(e)(2)(ii).
3. The permittee shall submit an annual report by February 1 of the year following the one for which the report is being made. This report shall include the following requirements:

- a. a signed statement from the facility owner or his designee stating that, "All operators of the solvent cleaning machine(s) have received training on the proper operation of the solvent cleaning machines and their control devices sufficient to pass the test required in paragraph 63.463(d)(10)."; and
 - b. an estimate of the solvent consumption for each solvent cleaning machine during the reporting period.
 4. The permittee shall submit deviation (excursion) reports which include an identification of each month during which methylene chloride emissions exceeded 1650 pounds per month, and the actual methylene chloride emissions for each such month.
 5. The permittee shall submit annual reports on or before January 30 of each year that identify:
 - a. the actual methylene chloride emissions in tons per year, and;
 - b. the actual amount of methylene chloride added to the emissions unit in gallons per year.
- E. Testing Requirements**
1. The permittee shall determine the the idling emission rate of of the solvent cleaning machine in accordance with 40 CFR Part 63, Subpart T, Appendix A, Reference Method 307.
 2. Compliance with the emission limitation(s) in Section A.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

1650 pounds of methylene chloride per month

Applicable Compliance Method:

The monthly methylene chloride emissions shall be based on the following equation.

$$E = [M_i - (M_o - s)](11.4 \text{ pounds/gallon})$$

E = methylene chloride emissions, in pounds per month

M_i = methylene chloride added during the month, in gallons

M_o = methylene chloride removed during the month, in gallons

s = solids content of the removed solvent, in gallons
- F. Miscellaneous Requirements**
1. This facility shall achieve compliance with all applicable provisions of 40 CFR Part 63, Subpart T no later than December 2, 1997.
 2. Sections A, B, C, D, E and F of this permit are federally enforceable.