

Facility ID: 1677010451 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

R003 - touch-up booth;
Z001 - 500-gallon TCE storage tank;
Z003 - mix room;
Z004 - detergent cleaner;
Z005 - boiler;
Z006 - drying oven;
Z007 - injection molding unit #1;
Z008 - injection molding unit #2;
Z009 - injection molding unit #3;
Z010 - injection molding unit #4;
Z011 - injection molding unit #5;
Z012 - injection molding unit #6;
Z013 - injection molding unit #7;
Z014 - injection molding unit #8;
Z015 - injection molding unit #9;
Z016 - injection molding unit #10;
Z017 - injection molding unit #11;
Z018 - injection molding unit #12;
Z019 - injection molding unit #13;
Z020 - injection molding unit #14;
Z021 - injection molding unit #15;
Z022 - injection molding unit #16;
Z023 - injection molding unit #17;
Z024 - injection molding unit #18;
Z025 - injection molding unit #19;
Z026 - pellet storage silo #1;
Z027 - pellet storage silo #2;
Z028 - pellet storage silo #3;
Z029 - pellet storage silo #4;
Z030 - pellet storage silo #5;
Z031 - pellet storage silo #6;
Z032 - pellet grinder #1;
Z033 - pellet grinder #2;
Z034 - pellet grinder #3;
Z035 - pellet grinder #4;
Z036 - pellet grinder #5;
Z037 - pellet grinder #6;
Z038 - pellet grinder #7; and
Z101 - solvent cold cleaner.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010451 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

1. None.

I. 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>
electrostatic paint booth	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents [for miscellaneous metal coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC rule 3745-21-09]

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the booth:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (in pounds of VOC per gallon of coating, excluding water and exempt solvents), as applied.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. Testing Requirements

1. Compliance with the emission limitation in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 and the procedures specified in OAC rule 3745-21-10(B). In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

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VI. **Miscellaneous Requirements**

- 1. None

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B. State Enforceable Section

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

- 1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010451 Emissions Unit ID: L001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

1. None.

I. 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>
metal wash in-line vapor degreaser used to clean metal parts	OAC rule 3745-21-09(O)(6)(b)	Paragraphs (O)(2) through (O)(5) of OAC rule 3745-21-09 shall not apply to any solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T.
	40 CFR Part 63, Subpart T	The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine do not exceed 153 kilograms/square meter/month (31.4 pounds/square foot/month) as a rolling, 3-month average (1066 pounds/month based on a solvent/air interface area of 34 square feet).

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.
2. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions as specified in section A.V.1.a below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
3. The permittee shall, on the first operating day of the month, comply with the following:
 - a. using the records of solvent additions and removals for the previous monthly reporting period, determine the trichloroethylene emissions using the equation specified in section A.V.1.a of this permit;
 - b. determine the total amount of trichloroethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms or pounds of solvent per month) as specified in

section A.V.1.b of this permit; and

- c. determine the monthly, rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in section A.V.1.c of this permit.
4. The permittee shall maintain the following records either in electronic or written form for a period of 5 years:
 - a. the dates and amounts of trichloroethylene that are added to the solvent cleaning machine;
 - b. the trichloroethylene composition of wastes removed from the cleaning machines using the procedures described in section A.V.1.b of this permit; and
 - c. calculation sheets showing how the monthly emissions and the rolling, 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.
5. The permittee shall maintain records of all control equipment maintenance in a readily accessible location for at least 5 years and shall make these records available to the director upon verbal or written request.

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IV. Reporting Requirements

1. The permittee shall submit an annual solvent emission report by February 1 of each year. The report shall cover the previous calendar year and shall contain the following information:
 - a. the size (solvent/air interface area) and type of the solvent cleaning machine;
 - b. the average monthly trichloroethylene consumption for the solvent cleaning machine, in kilograms or pounds per month; and
 - c. the rolling, 3-month average of trichloroethylene emissions estimates, calculated each month using the method as described in section A.V.1.a of this permit.
2. The permittee shall submit an exceedance report on a semiannual basis. These semiannual reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 30 and July 30 of each year and shall cover the previous 6-month period. If the trichloroethylene rolling, 3-month average of 153 kilograms/square meter/month (31.4 pounds/square foot/month) is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency). These quarterly reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 30, April 30, July 30, and October 30 of each year and shall cover the previous 3-month period. 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 record keeping and monitoring requirements specified in 40 CFR Part 63.1, General Provisions; and
 - c. the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in the General Provisions of 40 CFR Part 63.1(e)(3)(iii), Subpart A.

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

 - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR Parts 63.463 (e) and (f), including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
 - b. if no exceedance has occurred, a statement to that effect shall be submitted.

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V. Testing Requirements

1. The permittee shall, on the first operating day of every month, comply with the following requirements:
 - a. Using the records of all solvent additions and removals for the 3 previous monthly reporting periods required in section A.III.1 of this permit, determine the halogenated HAP solvent emissions (E_i) using the equation below for cleaning machines with a solvent/air interface:

$$E_i = (SA_i - LSRI - SSRI) / AREA_i$$

where:

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

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

LSRI = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine

during the most recent monthly reporting period i (kilograms or pounds of solvent per month).

SSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, obtained as described below in section A.V.1.b of this section, during the most recent monthly reporting period i (kilograms or pounds of solvent per month); and

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

b. Determine SSR_i from tests conducted using U.S. EPA Reference Method 25D or from engineering calculations included in the compliance report.

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

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

where:

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

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

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

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

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

2. Compliance with the emission limitation in section A.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

153 kilograms/square meter/month (31.4 pounds/square foot/month) as a rolling, 3-month average

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated based upon the monthly record keeping of solvent usage in section A.III and through the calculation methods provided in section A.V.1.

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VI. **Miscellaneous Requirements**

1. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The PTE shall be determined in accordance with the following procedures:

a. Determine the PTE for each individual solvent cleaning machine using the following equation:

$PTE_i = H_i \times W_i \times SAI_i$

where:

PTE_i = the potential to emit for the solvent cleaning machine i (kilograms of solvent per year);

H_i = hours of operation for solvent cleaning machine i (hours per year) = 8760 hours per year, unless otherwise restricted by a federally enforceable requirement;

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour)

$W_i = 1.95$ kilograms per square meter per hour for batch vapor and cold cleaning machines

$W_i = 1.12$ kilograms per square meter per hour for in-line cleaning machines; and

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). 40 CFR Part 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

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B. State Enforceable Section

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

- 1. None.

I. 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>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None