

Facility ID: 1677130077 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: 1677130077 Emissions Unit ID: L001 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>
L001- Phillips (model 2C-2000E) open-top batch vapor degreaser utilizing perchloroethylene	OAC rule 3745-31-05(A)(3) (PTI 16-02276)	Organic compounds (OC) shall not exceed 0.37 ton/month and 4.46 tons per year (tpy).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), and 40 CFR Part 63, Subpart T.
	OAC rule 3745-31-05(C)	Annual perchloroethylene usage rates and combined annual emissions shall not exceed the following as 12-month summations, respectively:  660 gallons/year of perchloroethylene; and  4.46 tpy of perchloroethylene emissions.
	OAC rule 3745-21-09(O) 40 CFR Part 63, Subpart T	See A.2.a below. See A.2.b below. See A.2.c through A.2.e below.

**2. Additional Terms and Conditions**

- (a) The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAP) [as identified in Section 112(b) of Title III of the Clean Air Act] from this facility shall be less than 10 tpy for any single HAP and less than 25 tpy for any combination of HAPs, based upon rolling, 12-month summations.  
The emission limitation required by this applicable rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63, Subpart T.  
The permittee shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.  
The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.  
The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
  - i. The solvent cleaning machine shall be designed or operated to 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 from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes and other defects.
  - ii. The solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - iv. The solvent 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.

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

vi. The solvent cleaning machine shall have a primary condenser.

**B. Operational Restrictions**

1. The permittee shall meet all of the following required work and operational practices:
  - a. Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques:
    - i. Cover(s) for the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
  - b. The parts baskets or the parts being cleaned in 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.
  - 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 (i.e., a baffled or enclosed area of the solvent cleaning machine).
  - d. 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 Director (the Akron RAQMD).
  - e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
  - f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
  - g. 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.
  - h. 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.
  - i. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (the Akron RAQMD) to achieve the same or better results as those recommended by the manufacturer.
  - j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (the Akron RAQMD).
  - k. 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.
  - l. Sponges, fabric, wood, and paper products shall not be cleaned.

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

1. The permittee shall monitor the hoist speed as described below:
  - 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 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.
  - c. 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.
  - d. If the permittee can demonstrate to the satisfaction of the Director (the Akron RAQMD) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
2. 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. 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.); and
  - c. records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
3. 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 control device monitoring required in this section of the permit;
  - b. information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including 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 perchloroethylene consumption for the solvent cleaning machine.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
5. The permittee shall maintain the following monthly records for the vapor degreaser:
- a. the name and identification of each solvent employed;
  - b. the total number of gallons of each solvent employed;
  - c. the number of gallons of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation;
  - d. the solvent usage rate for the month (i.e., [(b) - (c)], in gallons;
  - e. the total monthly OC/perchloroethylene emission rate, in tons per month (i.e. [(d) \* the solvent density (13.5 lbs/gallon) / 2000 lbs/ton];
  - f. the rolling, 12-month summation of the perchloroethylene usage figures; and
  - g. the rolling, 12-month summation of the total perchloroethylene emissions, in tons [the sum of (e) for the previous 12 calendar months].

**D. Reporting Requirements**

1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d)(1) of Subpart A, with the following revisions and additions:
- a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
  - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
  - c. The report shall include an estimate of the annual perchloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), Subpart A.
2. The permittee shall submit an initial statement of compliance no later than 150 days after startup. Each initial statement of compliance shall contain the following:
- a. the name and address of the permittee;
  - b. the address (i.e., physical location) of the solvent cleaning machine;
  - c. a list of the control equipment used to achieve compliance; and
  - d. a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
3. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
- a. a signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463(d)(10)."; and
  - b. an estimate of solvent consumption during the reporting period.
4. The permittee shall submit an exceedance report on a semiannual basis if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection.

Beginning the following quarter after submitting the above mentioned semiannual exceedance report, 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 (the Akron RAQMD). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

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

5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation and usage limitation for perchloroethylene.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly mass emission limitation for OC, and the actual OC emissions for each such month.
7. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

**E. Testing 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 potential to emit shall be determined in accordance with the following procedures:

Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

where:

PTE<sub>i</sub> = the potential to emit for the solvent cleaning machine i (kilograms solvent per year)

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

W<sub>i</sub> = the working mode uncontrolled emission rate (kilograms per square meter per hour) = 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines = 1.12 kilograms per square meter per hour for in-line cleaning machines; and

SAI<sub>i</sub> = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

where:

SAI = the solvent/air interface area (square meters); and

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

Sum the PTE<sub>i</sub> for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

2. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:

0.37 ton/month of OC  
4.46 tpy of OC

Applicable Compliance Method:

Compliance with the monthly and annual OC emission limitations shall be demonstrated based upon the record keeping requirements specified in section C.5 above.

Emission and Usage Limitations:

4.46 tpy of perchloroethylene emissions  
660 gallons/year of perchloroethylene

Applicable Compliance Method:

Compliance with the annual perchloroethylene emission limitation and the annual perchloroethylene usage limitation shall be demonstrated based upon the record keeping requirements specified in section C.5 above.

**F. Miscellaneous Requirements**

1. None