



State of Ohio Environmental Protection Agency

Street Address:
122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-03589**

CERTIFIED MAIL

DATE: January 6, 2000

S. K. Wellman LTD., Inc.
C Kent Yeager
5372 West 130th Street
Brook Park, OH 44142

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
CLEVELAND DIVISION OF THE ENVIRONMENT



**Permit To Install
Terms and
Conditions**

**Issue Date: January 6, 2000
Effective Date: January 6, 2000**

FINAL PERMIT TO INSTALL 13-03589

Application Number: 13-03589
APS Premise Number: 1318121632
Permit Fee: **\$400**
Name of Facility: S. K. Wellman LTD., Inc.
Person to Contact: C Kent Yeager
Address: 5372 West 130th Street
Brook Park, OH 44142

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5372 West 130th Street
Brook Park, Ohio**

Description of proposed emissions unit(s):
**DETREX NEW INLINE VAPOR DEGREASER EMPLOYING PERCHLOROETHYLENE USED TO
CLEAN STEEL RINGS FOR CLUTCH DISCS.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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PTI Application: **13-03589**
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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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9. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC (PCE)	42.31

S. K. Wellman LTD., Inc.
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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
New in-line vapor degreaser with refrigerated free board chiller and increased dwell time.	40 CFR 63, Subpart T OAC rule 3745-21-09 (0)	Idling Emission Limit Less stringent than MACT Standard (40 CFR 63, Subpart T)

2. Additional Terms and Conditions

- 2.a The permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.10 kilograms per hour per square meter (0.021 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.
- 2.b The permittee shall perform the following activities:
 - i. Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and to establish parameters that will be monitored to demonstrate compliance.
 - ii. Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - iii. Operate the solvent cleaning machine within parameters identified in the initial performance test.
- 3. The permittee shall ensure that the solvent cleaning machine conforms to the following design

requirements:

- i. 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 been performed that requires the cover to not be in place. The cover must be able to be readily opened or closed, completely cover the cleaning machine openings when in place, and 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 vapor level control 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.

II. Operational Restrictions

1. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
 - a. Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques:
 - i. The permittee shall employ a reduced room draft that ensures that the flow or movement 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 (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this

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permit. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

- b. 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).
- c. 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 (appropriate field office or local area agency).

- d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
- e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
- f. 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.
- g. 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.
- h. 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 (appropriate field Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.
- i. 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, Appendix B if requested during an inspection by the Director (appropriate field Office or local air agency).
- j. 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.
- k. Sponges, fabric, wood, and paper products shall not be cleaned.
- l. The owner or operator shall ensure that the chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- m. If an idling-mode cover is used to comply with these standards, the owner or operator shall comply with the following requirements:

- i. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - ii. Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
- n. The owner and operator shall determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described below:
- i. Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.
 - ii. The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in previous paragraph.

III. Monitoring and/or Recordkeeping 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 (appropriate District Office or local air agency) 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.
 - e. Each owner or operator of an in-line solvent cleaning machine shall conduct monitoring

and record the results on a weekly basis for the control devices:

- i. If a freeboard refrigeration device is used to comply with these equipment standards, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- f. Each owner or operator of an in-line solvent cleaning machine complying with the equipment standards shall conduct monitoring and record the results on a monthly basis for the control devices:
 - i. The owner or operator shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - g. The owner or operator shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
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.
 - c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
 - d. Records of the tests required as outlined in the "Testing Requirements" section of this permit to determine an appropriate dwell time for each part or parts basket.
 - e. Each owner or operator of an in-line solvent cleaning machine complying with the idling emission limits shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test.
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.

- c. Estimates of annual solvent consumption for the solvent cleaning machine.

IV. 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:

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- 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 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 for compliance no longer than 150 days after startup. The 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 control equipment used to achieve compliance.
 - 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 Part 60.463(d)(10)."
 - b. An estimate of solvent consumption during the reporting period.
4. The permittee shall submit an exceedance report on a semiannual basis. If the appropriate dwell time for each type part or parts basket or the maximum dwell time was not determined and if after cleaning, each part was not held in the solvent cleaning machine freeboard area above the vapor zone for the proper or the maximum dwell time for that particular part or parts basket, 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 field office or local area agency). The permittee may receive approval of less frequent reporting if 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 Recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate field office or local area 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.
- b. If no exceedance has occurred, a statement to that effect shall be submitted.

V. Testing Requirements

1. The permittee shall determine the appropriate dwell time for each part or parts basket using the following procedures:
 - a. Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.
 - b. The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in paragraph (1) (a) of this section.
2. The permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of 40 CFR part 63, Appendix A. This report shall comply with the following requirements:
 - a. The test must be conducted on the same specific model solvent cleaning machine used at the facility. The test can be done by the permittee of the affected machine or can be supplied by the vendor of that solvent cleansing machine or a third party. If a solvent cleaning machine vendor or a third party test report is used to demonstrate compliance, the following requirements shall be met:
 - i. The report shall include the following for the solvent cleaning machine tested:
 - Name of person (s) or company that performed the test, model name, the date the solvent cleaning machine ne was tested, serial number and a diagram of the solvent cleaning machine tested.

- ii. The permittee shall comply with the following requirements:
- (a) Submit a statement by the solvent cleaning machine vendor that the unit tested is the same as the unit the report is being submitted for.
 - (b) Demonstrate to the satisfaction of the Director (appropriate filed office or local area agency) that the perchloroethylene emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the perchloroethylene emissions from the solvent cleaning machine in the vendor test report.
- b. The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.
3. 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:
- a. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with 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 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).

= 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.

SAI_i = 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.

- b. 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).

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

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
New in-line vapor degreaser with refrigerated freeboard chiller and increased dwell time. Used to clean steel rings for clutch discs.	OAC rule 3745-31-05(A)(3)	9.66 lbs/hr and 42.31 tons/year Perchloroethylene Equivalent in stringency to MACT Standard (40 CFR 63, Subpart T)

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The amount of Perchloroethylene added to the tank (gallons).
 - b. The amount for Perchloroethylene removed from tank (gallons).
 - c. The amount of hours tank was in operation (hours/month)
2. The permittee shall keep the following records for the waste material from emissions unit L002 sent for reclamation or disposal:
 - a. the date the waste was sent for reclamation or disposal;
 - b. the amount of waste solvent sent off-site for disposal or reclamation, in gallons;
 - c. the amount of perchloroethylene in waste based on the most recent waste analysis, in tons of perchloroethylene; and,
 - d. the average monthly perchloroethylene in waste for each calendar month based on the time period the waste was generated and the amount of perchloroethylene in waste from (c), in tons per month

IV. Reporting Requirements

The permittee shall notify Cleveland Bureau of Air Pollution Control within five (5) calendar days of any record showing an exceedance of limitation contained in this permit. A copy of such record shall be sent to Cleveland BAPC within 45 days following the date of the excursion. Accompanying the record, the permittee shall indicate, in writing, the probable cause(s) of the excursion(s) and the steps which have been implemented to correct the violation(s) and prevent any such future occurrences.

V. Testing Requirements

Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation(s):

9.66 lbs/hr, 42.31 tons/year Perchloroethylene.

Applicable Compliance Method:

Compliance with the emission limitations shall be determined pursuant to the recordkeeping above. Also, compliance shall be determined with the following equations:

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S. K. V

PTI A₁

January 6, 2000

Emissions Unit ID: L002

$$E(\text{lbs/month}) = (\text{SA}(\text{gallons}) - \text{SR}(\text{gallons})) * \text{solvent density (lbs/gal)}$$

$$E_h(\text{lbs/hour}) = E(\text{lbs/month}) / H(\text{hrs/month})$$

$$E_t(\text{tpy}) = E_h / 2000 \text{ lbs/ton} * H_t(\text{hrs/year})$$

Where:

SA = solvent added

SR = solvent removed

H, H_t = hours of operation

E, E_h, E_t = emissions

VI. Miscellaneous Requirements

None.