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Facility Name: **Marc Avenue Corporation**

Application Number: **16-1584**

Date: **February 18, 1999**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

The proposed source(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 source(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 Ohio Administrative Code (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

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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 cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **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.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Marc Avenue Corporation** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification</u>	<u>Description</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	F001		booth with replaceable filters and electric drying oven (line #2)
K001		Metal parts spray paint booth with replaceable filters and electric drying oven (line #1)	
	K002 cont'd		
	L001		Open top vapor degreaser.
	F001 cont'd		
K002		Metal parts spray paint	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Paved  
and  
unpaved  
plant  
road-ways and  
parking  
areas.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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control particulate fugitive dust.  
matter.

BAT  
Determination

Limited  
coating usage  
to less than  
3.0 gallons  
per day and  
replaceable  
filters to  
control  
particulate  
matter.

Compliance with  
the federal NESHAP  
standard for  
halogenated  
solvent cleaning  
operations.

Limited coating usage to less than 3.0 gallons per day and replaceable filters to	Compliance with the special terms and conditions of this permit and reasonably available control to minimize
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			3745-17-08	
	Applicable Federal & <u>OAC Rules</u>	3745-21-09 (U)		
3745-31-05				
		3745-31-05		
3745-17-07				
		40 CFR 63T		
3745-17-11				
		3745-21-09 (O)		
3745-21-09 (U)				
		3745-31-05		
3745-31-05				
		3745-17-07		
3745-17-07				
3745-17-11				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	20% opacity as a six-minute average.	employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. (See Additional Special Terms and Conditions).	
	3.3 TPY organic compound 18 lbs/day organic compounds.	0.551 lb/hr particulate matter. 2.4 tons/yr particulate matter. 3.0 gallons of coating employed per day.		
	20% opacity as a six-minute average.	2.8 TPY trichloroethylene		
	0.551 lbs/hr particulate matter. 2.4 ton/yr particulate matter.	150 kg/m <sup>2</sup> /month (See Additional Special Terms and Conditions).		
	3.0 gallons of coating employed per day.	Equal to or less stringent than the requirements of 40 CFR 63, Subpart T.		
	3.3 TPY organic compound 18 lbs/day organic compounds.	1.0 TPY particulate matter.		
		No visible emissions except for three minutes in any hour for unpaved roadways and parking areas and one minute for paved roadways and parking areas.		
		The permittee shall		

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#### SUMMARY

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Trichloroethylene	2.8
Organic Compounds	6.6
Particulates	5.8

#### RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, Ohio 44308.**

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of

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the sources.

#### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, Ohio 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **BAT FOR OPEN TOP VAPOR DEGREASERS**

In accordance with OAC Rule 3745-21-09(0)(3), each owner or operator of an open top vapor degreaser shall:

- a. equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

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- b. install the following safety switches:
  - i. 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;
  - ii. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
  - iii. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and,
  - iv. 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;
  
- c. install one of the following devices:
  - i. a freeboard with a freeboard ratio greater than or equal to 0.75 - if the open top vapor degreaser opening is greater than 10 square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use;
  - ii. refrigerated chiller;
  - iii. enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);
  - iv. carbon adsorption system, with ventilation greater than or equal to 50 cubic feet per minute per square foot of air/solvent interface (when cover is open), and

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- exhausting less than 25 parts per million (ppm) of solvent averaged over one complete adsorption cycle; or
- v. a control system, demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the Director; and,
  - vi. 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.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**I. F001**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period.
- 2. There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period.

**B. Additional Terms and Conditions**

- 1. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

unpaved roadways and parking areas:

Gravel Segment C  
Gravel Segment E

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paved roadways and parking areas:

Asphalt Segment A  
Concrete Segment B  
Concrete Segment D

2. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
3. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
4. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. (Note that "water flushing" refers to using large quantities of water to carry off surface material, while "watering" refers to simply wetting the surface material.)

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5. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
6. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas specified in OAC rule 3745-17-07(B)(4).
7. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
8. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
9. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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**C. Operational Restrictions**

1. The permittee shall certify or possess certification that all dust suppressants used to control fugitive dust meet the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261.
2. The permittee shall not apply used oil as defined by OAC rule 3745-279-01(A)(12) as a dust suppressant.

**D. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

<u>unpaved roadways and parking areas</u>	<u>minimum</u>	<u>inspection</u>
<u>frequency</u>		

All	Daily
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<u>Paved roadways and parking areas</u>	<u>minimum inspection</u>
---	---------------------------

All	<u>frequency</u>
	<u>ency</u>
	Weekly

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned

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applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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3. The permittee may, upon receipt of written approval from the Akron Air Pollution Control, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and,
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**E. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,

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- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted within 30 days of the record indicating the deviation had taken place.

**F. Testing Requirements**

1. Compliance with the emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

**G. Miscellaneous Requirements**

None

**II L001**

**A. Emission Limitations**

1. The permittee shall ensure that the Trichlorethylene monthly emissions from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms/square meter/month.

**B. Monitoring And Recordkeeping**

1. The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.
2. The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 150 kilograms/square meters/month on a monthly basis as follows:

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- a. 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. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations; and,
- b. the permittee shall on the first operating day of the month comply with the following:
  - i. Using the records of solvent additions and removals for the previous monthly reporting period, determine Trichlorethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit.
  - ii. Determining the total amount of Trichlorethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms of solvent per month) as specified in the "Testing Requirements" section of this permit.
  - iii. Determining the monthly rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in the "Testing Requirements" section of this permit.
3. The permittee shall maintain the following records either in electronic or written form for a period of five years:
  - a. the dates and amounts of Trichlorethylene that are added to the solvent cleaning machine;

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- b. the Trichlorethylene composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit; and,
- c. calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of Trichlorethylene from the solvent cleaning machine were determined, and the results of all calculations.

**C. Reporting Requirements**

- 1. The permittee shall submit an initial statement of compliance. Each initial statement of compliance shall contain the following:
  - a. the name and address of the permittee of the solvent cleaning machine;
  - b. the address (i.e., physical location) of the solvent cleaning machine;
  - c. the solvent/air interface area for the solvent cleaning machine; and,
  - d. the results of the first 3-month average of Trichlorethylene emission calculations.
- 2. The permittee shall submit an annual solvent emission report by February 1 of each year. The report shall cover the previous calendar year. The report shall contain the following:
  - a. the size (solvent/air interface area) and type of the solvent cleaning machine;
  - b. the average monthly Trichlorethylene consumption for the solvent cleaning machine in kilograms per month; and,

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- c. the 3-month monthly rolling average Trichlorethylene emissions estimates calculated each month using the method as described in the "Testing Requirements" section of this permit.
- 3. The permittee shall submit an exceedance report on a semiannual basis. If the Trichlorethylene three-month rolling average of 150 kilograms/square meter/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 (Akron Air Pollution Control). 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 recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Akron Air Pollution Control) 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.

**D. Testing Requirements**

- 1. The permittee shall on the first operating day of every month:

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- a. 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 soil. 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 paragraph (1) (b) below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
- b. comply with the following requirements:
  - i. Using the records of all solvent additions and removals for the three previous monthly reporting periods required in the "Monitoring and/or Record keeping Requirements" section of this permit, determine solvent emissions ( $E_i$ ) using equation (1) below for cleaning machines with a solvent/air interface:

$$E_i = (S_{Ai} - LSR_i - SSR_i) / AREA_i \dots (1)$$

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 are per month).

$S_{Ai}$  = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period  $i$  (kilograms of solvent per month).

$LSR_i$  = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent

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monthly reporting period  $i$  (kilograms 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 paragraph (b) of this section, during the most recent monthly reporting period  $i$  (kilograms of solvent per month).

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

- ii. determine  $SSR_i$  from tests conducted using reference method 25d or from engineering calculations included in the compliance report; and,
- iii. determine the monthly rolling average EA for the 3-month period ending with the most recent reporting period using equation (2) for cleaning machines with a solvent/air interface.

$E_{ai} = (\sum E_i) / 3$ , where the summation is from  $j=1$  to  $j= 3$  ....(2)

Where:

$E_{ai}$  = 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).

$E_i$  = 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

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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. 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. 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:

$PTE_i$  = 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.

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= 1.12 kilograms per square meter per hour  
for in-line cleaning machines.

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.

- c. 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.

**III K001, K002**

**A. Emission Limitations**

1. The Daily emissions of organic compounds from emissions  
unit K001 and K002 shall not exceed 18 pounds per day  
per emissions unit.
2. The annual emissions of organic compounds from  
emissions unit K001 and K002 shall not exceed 3.3 tons  
per year per emissions unit.

**B. Operational Restrictions**

1. The permittee shall operate and maintain a fabric  
filter in accordance with the manufacturer's  
recommendations, instructions, and operating manual(s).

**C. Monitoring and/or RecordKeeping Requirements**

1. The permittee shall collect and record the following  
information each day for the coating line:
  - a. the name and identification number of each coating  
employed;
  - b. the volume, in gallons, of each coating employed;

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- c. the total volume, in gallons, of all of the coatings employed;
- d. the VOC Content of each coating employed;
- e. the net clean up solvent used in pounds per day; and,
- f. the calculated daily VOC emissions rate in pounds per day.

**D. Reporting Requirements**

- 1. The permittee shall notify the Director (Akron Air Pollution Control) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Akron Air Pollution Control) within 45 days after the exceedance occurs.
- 2. The permittee shall notify the Director (Akron Air Pollution Control) in writing of any daily record showing that the coating line exceeded the daily allowable VOC emissions rate. The notification shall include a copy of such record and shall be sent to the Director (Akron Air Pollution Control) within 45 days after the exceedance occurs.

**E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in PTI #16-1584 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

3.0 gallon of coating employed per day

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of each coating and cleanup material employed, and the calculated daily VOC emission

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rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

b. Emission Limitation:

18 lbs VOC per day  
3.3 tons/year VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating employed, and the calculated daily emission rate for organic compounds. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating.

c. Emission Limitation:

0.551 lb/hr particulate matter

Applicable Compliance Method:

Multiply the maximum hourly coating usage rate, in gallons per hour, by the STAPPA derived particulate emission factor of 0.206 pound per gallon.

d. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B) (1).

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic

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Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.