Facility Name: **Crest Rubber Company**
Application Number: **16-1833**
Date: **March 17, 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

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.

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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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Crest Rubber Company** located in **Portage** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
L001	Open top batch vapor degreaser.	Compliance with the terms and conditions of this permit and the federal EPA MACT standards.	3745-31-05	300 lbs/month of organic compounds.
			3745-21-09 (D)	1.8 TPY OC See Additional Special Terms and Conditions.
			40 CFR 63 Subpart T	See Additional Special Terms amd Conditions.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Organic Compounds	1.8

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 Regional Air Quality Management District, 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 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 Regional Air Quality Management District, 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operations/Equipment

All of the following statements in this section are based upon application data and other information made available by the permittee.

Crest Rubber Company is applying for a Permit-to-Install (PTI) for a halogenated solvent open-top batch vapor degreaser located at the Portage County, OH facility. The vapor degreaser, which cleans with perchloroethylene solvent (CAS No. 127-18-4), was installed in 1987 and is defined under 40 CFR Part 63, Subpart T-National Emission Standards for Halogenated Solvent Cleaning as an existing machine. The cleaner has a solvent/air interface of 9.75 square feet, a freeboard ratio of 1.65, and is provided with reduced room draft. Actual annual emissions of perchlorethylene from the vapor degreaser are calculated at 0.7 ton/year. The solvent cleaning machine employs neither a lip exhaust nor a carbon adsorption system.

As of the writing of this permit, the permittee has submitted the following reports as required under 63.468 of Subpart T:

Initial Notification Report - originally submitted Sept. 1, 1995, revised and resubmitted Aug. 17, 1998.
Initial Statement of Compliance Report - submitted Aug. 20, 1998.
Exceedance Report - Submitted Aug. 17, 1998 showing no exceedances occurred during the first semi-annual period of 1998.

B. Best Available Technology (BAT)

Compliance with the federal maximum achievable control technology (MACT) requirements for halogenated solvent degreaser machines, including compliance with all the terms and conditions of this permit, constitutes BAT as required in accordance with the provisions of Ohio Administrative Code (OAC) rule 3745-31-05. The permittee wishes to comply with the MACT requirements via the "Alternative Standards" under 63.464 of Subpart T, with the applicable 3-month rolling average monthly solvent emission limit for this machine of 150 kilograms/square meter/month (30.7 pounds/square foot/month), as listed in "Table 5-Emission Limits For Batch Vapor And In-Line Solvent Cleaning Machines With A Solvent/Air Interface".

C. Additional Terms and Conditions

1. The permittee shall ensure that the perchlorethylene monthly emissions from the solvent cleaning machine do not exceed the 3-month rolling average monthly limit of 30.7 pounds/square foot/month. Also, based upon a 3-month rolling average, monthly emissions of perchlorethylene shall not exceed 300 pounds/month.

2. Pursuant to the best available technology (BAT) requirements for new sources, as covered under OAC rule 3745-31-05, the permittee shall perform the following:

   a. compliance with the federal EPA MACT standards; and,

b. compliance with all the terms and conditions of this permit.

3. Operate and maintain the open top vapor degreaser in a manner consistent with good engineering practice, including:

a. maintaining a freeboard ratio greater than or equal to 1.65;

b. operating the vapor degreaser with the cover open only when the dry part is actually entering or exiting the degreaser unit, and with the cover closed at all other times when the degreaser is cleaning or not in use; and,

c. providing reduced room draft to the degreaser unit as specified below in "Operational Restrictions".

D. Operational Restrictions

1. In accordance with OAC rule 3745-21-09, the permittee shall:

a. employ a properly installed open top vapor degreaser cover that can be opened and closed easily without disturbing the vapor zone;

b. employ a properly installed, maintained and operated 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;

c. employ a properly installed, maintained and operated spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;

d. employ a properly installed, maintained and operated vapor level control thermostat or any

other device which shuts off the sump heat when the vapor level rises too high; and,

e. employ a properly installed, maintained and operated water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

2. The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

   a. keep the cover closed at all times except when processing work loads through the degreaser.

3. Minimize solvent carry-out by:

   a. racking parts so that solvent drains freely and is not trapped;

   b. moving parts in and out of the degreaser at less than 11 feet per minute;

   c. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;

   d. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone;

   e. allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer;

   f. clean only materials that are neither porous nor absorbent;

   g. occupy no more than one-half of the degreaser's open-top area with a workload;

   h. always spray within the vapor level;

   i. repair solvent leaks immediately, or shut down the degreaser;

j. store waste solvent only in covered containers;

k. operate the cleaner such that water cannot be visually detected in solvent exiting the water separator;

l. use no ventilation fans near the degreaser opening;

m. when the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip; and,

n. provide a permanent, conspicuous label, summarizing the operating procedures.

E. Monitoring and/or Recordkeeping Requirements

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 30.7 pounds/square foot/month on a monthly basis as follows:

   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.

3. The permittee shall on the first operating day of the month comply with the following:

   a. using the records of solvent additions and removals for the previous monthly reporting period, determine perchlorethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit;

   b. determining the total amount of perchlorethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (pounds of solvent per month) as specified in the "Testing Requirements" section of this permit; and,

   c. 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.

4. 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 perchlorethylene that are added to the solvent cleaning machine;

   b. the perchlorethylene 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 perchlorethylene from the solvent cleaning machine were determined, and the results of all calculations.

F. Reporting Requirements

1. The permittee shall submit required reports in the following manner:

   a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Akron Air Pollution Control; and,

   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 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 Akron Air Pollution Control. 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.);

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 perchlorethylene consumption for the solvent cleaning machine in pounds per month;

   c. the 3-month monthly rolling average perchlorethylene emissions estimates calculated

each month using the method as described in the "Testing Requirements" section of this permit; and,

d. the permittee shall submit an exceedance report on a semiannual basis. If the perchlorethylene three-month rolling average of 30.7 pounds/square foot/month is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (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:

i. 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;

ii. if no exceedance has occurred, a statement to that effect shall be submitted; and,

iii. The permittee shall submit deviation (excursion) reports identifying each month the organic compound emissions from this emissions unit exceeded the 300 pounds/month limit, based upon a 3-month rolling monthly

average.

G. Testing Requirements

1. MACT Compliance Provisions:

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 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 below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

Comply with the following requirements:

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 (Ei) using the equation below for cleaning machines with a solvent/air interface:

$$Ei = (SAi-LSRi-SSRi)/AREAi$$

Where:

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

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

LSRi = the total amount of halogenated HAP liquid solvent removed the solvent cleaning machine during the most recent monthly reporting period i (pounds of solvent per month).

SSRi = 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 (pounds of solvent per month).

AREAi = the solvent /air interface area of the solvent cleaning machine (square feet).

Determine SSRi from tests conducted using reference method 25d or from engineering calculations included in the compliance report.

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

Eai = (□Ei)/3, where the summation is from j = 1 to j = 3

Where:

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

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

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

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

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 for the solvent cleaning machine shall be determined in accordance with the following equation:

PTE = H x W x SAI/2000

Where:

PTE = 17.0 tons/year, the potential to emit for the solvent cleaning machine, in tons/year of solvent.

H = 8760 hours/year of operation for the solvent cleaning machine.

W = 0.399 pound/square foot/hour, the working mode uncontrolled emission rate.

SAI = 9.75 square feet, the solvent/air interface area of the solvent cleaning machine. Section 63.461 defines the solvent/air interface area.

2. Special Compliance Provisions:

This facility shall determine the concentration of the solvent(s) used in the cleaning machine in accordance with the methods and procedures specified in OAC rule 3745-21-10, or using material safety data sheets, or engineering calculations.

Compliance with the organic compound emission limit of 300 pounds/month, based upon a 3-month rolling monthly average, shall be determined in accordance with the appropriate equation specified in the "MACT Compliance Provisions" section above.

H. Miscellaneous Requirements

Facility Name: **Crest Rubber Company**
Application Number: **16-1833**
Date: **March 17, 1999**

This facility is subject to Title V permitting requirements and may be exempt by the State from applying for a Part 70 permit until 42 months after the State's Part 70 program is approved by USEPA. Another date may be established to assure that subject sources obtain a permit by 5 years after a Part 70 program is approved.