



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

7/9/2009

Certified Mail

Mr. Troy Kajfasz
Brush Wellman Inc.
14710 W. Portage River South Road
Elmore, OH 43416-9502

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0362000009
Permit Number: P0104940
Permit Type: Initial Installation
County: Ottawa

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install
for
Brush Wellman Inc.**

Facility ID: 0362000009
Permit Number: P0104940
Permit Type: Initial Installation
Issued: 7/9/2009
Effective: 7/9/2009



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Brush Wellman Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

Authorization

Facility ID: 0362000009
Facility Description: Copper Rolling and Drawing
Application Number(s): A0037509
Permit Number: P0104940
Permit Description: RBT Vapor Degreaser
Permit Type: Initial Installation
Permit Fee: \$1,000.00
Issue Date: 7/9/2009
Effective Date: 7/9/2009

This document constitutes issuance to:

Brush Wellman Inc.
14710 W. Portage River South Road
1/4 mile east of SR 590
Harris, OH 43416-9502

Of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

Authorization (continued)

Permit Number: P0104940
 Permit Description: RBT Vapor Degreaser

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	L004
Company Equipment ID:	RBT Vapor Degreaser
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, 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 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



(2) 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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 Ohio EPA DAPC, Northwest District Office 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).

6. Compliance Requirements

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

b) 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.

c) 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:



- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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



(i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. 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.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104940
Facility ID: 0362000009
Effective Date: 7/9/2009

C. Emissions Unit Terms and Conditions



1. L004, RBT Vapor Degreaser

Operations, Property and/or Equipment Description:

RBT Vapor Degreaser

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 11.08 tons per year.</p> <p>Work Practices and Control Design (see c)(1)</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(O)	See b)(2)b. through b)(2)f.

(2) Additional Terms and Conditions

a. The BAT requirements for this emissions unit includes: freeboard ratio control, a refrigerated chiller, and an enclosed design.

b. The open top vapor degreaser shall be equipped with and shall employ a cover and safety switches as described below:

i. The cover shall be installed so that it can be opened and closed easily without disturbing the vapor zone.

ii. A condenser flow switch and thermostat (or other such device) shall shut off the sump heat if the condenser coolant is either not circulating or too warm.

iii. If using a spray application, a spray safety switch shall shut off the spray pump if the vapor level drops below any fixed spray nozzle.

iv. A vapor level control thermostat (or other such device) shall shut off the sump heat when the vapor level rises too high.



- v. A water flow switch or water pressure switch (or other such device) shall shut off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.
 - c. The open top vapor degreaser shall be equipped with a freeboard and a freeboard ratio greater than or equal to 0.75 shall be maintained. 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.
 - d. Since the open top vapor degreaser opening is greater than 10 square feet, the cover shall be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use.
 - e. The open top vapor degreaser shall be installed with a refrigerated chiller that shall be operated to control the temperature of the solvent during cleaning operations.
 - f. The open top vapor degreaser shall be constructed with an enclosed design, i.e., the cover or door shall open only when the dry part is actually entering or exiting the degreaser.
- c) Operational Restrictions
- (1) The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. The cover shall be kept closed at all times except when processing work loads through the degreaser.
 - b. Solvent carry-out shall be minimized by:
 - i. racking parts so that solvent drains freely and is not trapped;
 - ii. moving parts in and out of the degreaser at less than 11 feet per minute;
 - iii. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
 - iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
 - v. allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer.
 - c. Porous and/or absorbent materials shall not be cleaned.
 - d. Workloads shall occupy no more than one-half of the degreaser's open-top area.
 - e. Solvent spraying shall only be conducted within the vapor level.



- f. Solvent leaks shall be repaired immediately, or the degreaser shall be shut down.
 - g. Solvent waste shall only be stored in covered containers.
 - h. The degreaser shall be operated so that water cannot be visually detected in solvent exiting the water separator.
 - i. No ventilation fans shall be used near the degreaser opening.
 - j. When the cover is open, the open top vapor degreaser shall not be exposed 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.
 - k. If a lip exhaust is used on the open top vapor degreaser, the ventilation rate shall not exceed 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - l. A permanent, conspicuous label, summarizing the operating procedures shall be posted on or near to the degreaser.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the following information:
 - a. the types of solvents employed in the open top vapor degreaser, including the chemical name(s) and concentration;
 - b. a record of the freeboard ratio before and after each addition of make-up solvent and the date of the solvent addition;
 - c. any period of time in which the freeboard ratio is not maintained at 0.75 or greater;
 - d. all maintenance conducted on the refrigerated chiller, or the freeboard ratio control, including the date and activity;
 - e. records of all maintenance conducted on the enclosed design of the degreaser and the removal of any covers or doors, including the date, activity, and whether or not maintenance was conducted during cleaning operations or downtime; and
 - f. the temperature (or temperature range) at which each cleaning solvent is maintained.
- These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (2) The permittee shall maintain records of the following information, collected at the end of each year:
 - a. the total cleaning solvent added to the open top vapor degreaser or the amount purchased for use in the emissions unit during the year;



- b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
- c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports documenting any period of time during which the freeboard was not maintained at a ratio of 0.75 or greater, and/or any period of time during which the open top vapor degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.
- (2) The permittee shall submit quarterly deviation reports documenting any period of time during which the refrigerated chiller was not in operation during cleaning operations, and/or any period of time during which the open top vapor degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.
- (3) The permittee shall submit quarterly deviation reports documenting any period of time during which the cover or door was open when parts were not actually entering or exiting the open top vapor degreaser; and/or any period of time during which the open top vapor degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

11.08 tons VOC/year

Applicable Compliance Method

Compliance with the ton/yr emissions limitation shall be determined based upon the recordkeeping requirements contained in Section d)(2) of this permit.

- (2) The permittee shall quantify VOC emissions through a material balance test, conducted for a sufficient period of time to compute an average emission rate. The following procedures shall be implemented in order to perform this material balance test and document the average VOC emissions from this emissions unit, as follows:
 - a. the degreaser tank shall be cleaned before testing begins;
 - b. records shall be maintained of the weight or volume of solvent used to initially fill the cleaning tank and the volume or weight of the make-up solvent added to the tank during the test period;



- c. at the end of the test period (which can coincide with the normal solvent replacement cycle) the used solvent shall be pumped or drained out of the tank and the volume or weight measured using the same method applied in [Ab](#) above;
- d. a record shall be maintained of the time (hours) passing between filling the tank with fresh solvent (start of test period) to the removal of the waste solvent, as well as, the number of parts or weight of the work load cleaned during the test period;
- e. a sample of the used solvent shall be analyzed for the percent oil, metal chips, and other contaminants (the oil and solvent proportions can be estimated by weighing samples of used solvent before and after boiling off the solvent);
- f. from the analysis of the used/waste solvent in [Ae](#), the volume or weight of oils, dissolved from the cleaned parts or work load, shall be documented;
- g. the total VOC emissions from the cleaning tank during the test period shall be calculated* from the volume or weight of solvent displaced by the oil, plus the total makeup solvent added to the tank to the same initial fill line, and this volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the solvent; or
- h. if the final solvent line is below the initial solvent line in the tank when the waste solvent is pumped or drained out, the total VOC emissions from the cleaning tank during the test period shall equal the measured volume or weight of fresh solvent used to initially fill the tank, minus the total volume or weight of used solvent pumped/drained out, plus the volume or weight of solvent displaced by the oil (calculated in [Ae](#) above), plus the volume or weight of makeup solvent added to the tank during the test period, and this total volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent; or
- i. as an alternative to the procedures for estimating VOC emission from the cleaning tank in [Ag](#) or [Ah](#) above, the VOC emissions may be calculated as the difference between the total volume of solvent added to the cleaning tank during the test period (the amount used to initially fill the tank and the makeup solvent added) and (minus) the solvent contained in the used solvent pumped or drained out; and this difference in volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent;
- j. the average VOC emissions rate shall be calculated by dividing the total emissions calculated in [Ag](#), [Ah](#), or [Ai](#) by the total hours of the test period (and/or divided by the total parts cleaned during the test period if an emissions per production rate is required) as recorded in [Ad](#); and
- k. if waste solvents pumped from the solvent cleaning tank are not immediately sealed to prevent evaporation and if a record is not maintained of the volume or amount sent offsite for recovery and/or disposal, such waste solvent losses shall be included with those calculated above in any required emissions report(s) if it



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cannot be demonstrated that this volume of material has been properly recovered or disposed of and/or has not been lost through evaporation to the atmosphere.

* If solvent measurements are recorded by volume the density of the solvent shall be used to convert gallons to pounds.

g) Miscellaneous Requirements

(1) None.