

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Heating Boiler (B001), Plant Air Make-up Unit (B002), Horizontal Blowers (B003), Natural Gas Fired Heater (B004), Natural Gas Fired Heater (B005), Natural Gas Fired Kolene Heater (B006), Proceadyne Heat Treatment (B007), Paint Line (K001), Heated Rinse Tanks (P001), Wheelabrator Tumbler (P002), Sandblasting (P003), Machine Finishing Tools (P005), Finishing Grinders (P006), Lapping Tables (P007), Aqueous Wash Tank (P008), Aqueous Wash Tank (P009), Vacuum Furnace (P011), Sursulf (P012), Tempering Oven (P013), Tempering Oven (P014), Paint Spray Booth (R001), Wastewater Storage Tank (T002), LPG Storage Tank (Z004)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

[Go to Part III for Emissions Unit L004](#)

[Go to Part III for Emissions Unit L005](#)

[Go to Part III for Emissions Unit L006](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vapor degreaser with refrigeration device and reduced room draft	40 CFR 63.463	See Additional Terms and Conditions 2.a thru 2.g and Sections II, III, IV and V.
	OAC rule 3745-21-09(O)(6)(b)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) thru (O)(5). See Additional Term and Condition 2.h.
	OAC rule 3745-31-05 (PTI 01-6328)	5.76 lbs/hr of organic compounds (OC) no more than 520 hours of operation per month no more than 261 gallons of cleaning solvent employed per month

2. Additional Terms and Conditions

- a. The permittee shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- b. The permittee shall reduce room draft to ensure that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
- c. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
- d. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- e. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- f. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- g. The solvent cleaning machine shall have a primary condenser.
- h. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to

consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for VOC.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1.
 - a. The parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
 - b. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - c. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA, Central District Office.
 - d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
 - f. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - g. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - h. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA, Central District Office to achieve the same or better results as those recommended by the manufacturer.
 - i. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix A if requested during an inspection by the Ohio EPA, Central District Office.
 - j. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
 - k. Sponges, fabric, wood, and paper products shall not be cleaned.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described below:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
 - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the satisfaction of the Ohio EPA, Central District Office in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - c. Records of the halogenated hazardous air pollutant (HAP) solvent content for the solvent used in the solvent cleaning machine.
3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
 - a. The results of control device monitoring required in this section of the permit.
 - b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

5. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
 - a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current in the enclosure by slowly rotating a velometer or similar device inside the entrance to the enclosure until the maximum speed is located.
 - ii. Record the maximum speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
6. The permittee shall maintain monthly records of the number of hours the solvent cleaning machine was in operation.
7. The permittee shall maintain monthly records of the number of gallons of solvent used in the solvent cleaning machine.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
 - a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463(d)(10)."
 - b. An estimate of solvent consumption during the reporting period.
2. The permittee shall submit an exceedance report on a semiannual basis. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection, or if no operating conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, or if the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection 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 Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office 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 contain the following:
 - a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463(e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
 - b. If no exceedance has occurred, a statement to that effect shall be submitted.
3. The permittee shall submit semiannual exceedance reports which identify each month during which the number of hours the solvent cleaning machine was in operation exceeded 520 hours, and the actual hours of operation for each such month. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no exceedance has occurred, a statement to that effect shall be submitted.
4. The permittee shall submit semiannual exceedance reports which identify each month during which the number of gallons of cleaning solvent employed in the solvent cleaning machine exceeded 261 gallons, and the actual gallons of solvent employed for each such month. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no exceedance has occurred, a statement to that effect shall be submitted.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
 - a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times S_{ALI}$$

Where:

PTE_i = the potential to emit for the solvent cleaning machine *i* (kilograms solvent per year).

H_i = hours of operation for solvent cleaning machine *i* (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

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

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

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

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

Where:

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

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

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
- 2. Compliance with the 5.76 lbs OC/hr limit is demonstrated based on the maximum allowable OC emission rate of 17.97 tons OC/year specified in section B.I.1 of this permit and 520 hours of operation/month as follows:

(17.97 tons OC/year) X (1 year/12 months) X (month/520 hours of operation) X (2000 lbs/ton) = 5.76 lbs OC/hr
- 3. Compliance with the operating hours limitation of 520 hours per month shall be based on the record keeping specified in section A.III.6 of this permit.
- 4. Compliance with the solvent usage limitation of 261 gallons of solvent per month shall be based on the record keeping specified in section A.III.7 of this permit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L004 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

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

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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- Vapor degreaser with refrigeration device and reduced room draft OAC rule 3745-31-05 (PTI 01-6328) OC emissions shall not exceed 17.97 tons/year.
2. **Additional Terms and Conditions**
1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

1. The permittee shall maintain records of the total annual liquid volume of cleaning solvent employed each year (gallons) and the total annual liquid volume of cleaning solvent sent off site as waste (gallons).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. **Reporting Requirements**

1. The permittee shall submit an annual report which summarizes the annual total OC emissions as calculated according to the "Testing Requirements" section of this permit. This report shall be submitted to the Ohio EPA, Central District Office by February 1 of each year and shall cover the operations of the solvent cleaning machine for the previous calendar year.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

1. Compliance with the emission limitation in section B.I.1 of this permit shall be determined in accordance with the following method:

Emission Limitation:
17.97 tons/year OC emissions

Applicable Compliance Method:
To determine the actual organic compound emission rate, the following equation shall be used:

$$E = (L_s - L_w) \times D / 2000$$

E = organic compound emissions rate (tons/year)

L_s = liquid volume of cleaning solvent employed each year (gallons)

L_w = liquid volume of cleaning solvent sent off site as waste (gallons)

D = density of cleaning solvent (pounds/gallon)

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual organic compound emission rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L005 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vapor degreaser with refrigeration device and reduced room draft	40 CFR 63.463	See Additional Terms and Conditions 2.a thru 2.g and Sections II, III, IV and V.
	OAC rule 3745-21-09(O)(6)(b)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) thru (O)(5). See Additional Term and Condition 2.h.
	OAC rule 3745-31-05 (PTI 01-6328)	1.92 lbs/hr of organic compounds (OC) no more than 520 hours of operation per month no more than 175 gallons of cleaning solvent employed per month

2. Additional Terms and Conditions

- a. The permittee shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- b. The permittee shall reduce room draft to ensure that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
- c. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
- d. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- e. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- f. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- g. The solvent cleaning machine shall have a primary condenser.
- h. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for VOC.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*****

II. Operational Restrictions

- 1.
 - a. The parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
 - b. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - c. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA, Central District Office.
 - d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

- f. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- g. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- h. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA, Central District Office to achieve the same or better results as those recommended by the manufacturer.
- i. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix A if requested during an inspection by the Ohio EPA, Central District Office.
- j. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
- k. Sponges, fabric, wood, and paper products shall not be cleaned.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*****

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

1. The permittee shall monitor the hoist speed as described below:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
 - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the satisfaction of the Ohio EPA, Central District Office in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - c. Records of the halogenated hazardous air pollutant (HAP) solvent content for the solvent used in the solvent cleaning machine.
3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
 - a. The results of control device monitoring required in this section of the permit.
 - b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
5. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
 - a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current in the enclosure by slowly rotating a velometer or similar device inside the entrance to the enclosure until the maximum speed is located.
 - ii. Record the maximum speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
6. The permittee shall maintain monthly records of the number of hours the solvent cleaning machine was in operation.
7. The permittee shall maintain monthly records of the number of gallons of solvent used in the solvent cleaning machine.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
 - a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463(d)(10)."
 - b. An estimate of solvent consumption during the reporting period.
2. The permittee shall submit an exceedance report on a semiannual basis. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection, or if no operating conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, or if the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection 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 Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office 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 contain the following:
 - a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463(e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
 - b. If no exceedance has occurred, a statement to that effect shall be submitted.
3. The permittee shall submit semiannual exceedance reports which identify each month during which the number of hours the solvent cleaning machine was in operation exceeded 520 hours, and the actual hours of operation for each such month. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no exceedance has occurred, a statement to that effect shall be submitted.
4. The permittee shall submit semiannual exceedance reports which identify each month during which the number of gallons of cleaning solvent employed in the solvent cleaning machine exceeded 175 gallons, and the actual gallons of solvent employed for each such month. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no exceedance has occurred, a statement to that effect shall be submitted.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
 - a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times S_{Ali}$$
 Where:
 - PTE_i = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).
 - H_i = hours of operation for solvent cleaning machine i (hours per year).
 - = 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.
 - W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).
 - = 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.
 - = 1.12 kilograms per square meter per hour for in-line cleaning machines.
 S_{Ali} = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.
 - b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using

the following equation:

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

Where:

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

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

- c. Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
- 2. Compliance with the 1.92 lbs OC/hr limit is demonstrated based on the maximum allowable OC emission rate of 5.99 tons OC/year specified in section B.I.1 of this permit and 520 hours of operation/month as follows:

$$(5.99 \text{ tons OC/year}) \times (1 \text{ year}/12 \text{ months}) \times (\text{month}/520 \text{ hours of operation}) \times (2000 \text{ lbs/ton}) = 1.92 \text{ lbs OC/hr}$$
- 3. Compliance with the operating hours limitation of 520 hours per month shall be based on the record keeping specified in section A.III.6 of this permit.
- 4. Compliance with the solvent usage limitation of 175 gallons of solvent per month shall be based on the record keeping specified in section A.III.7 of this permit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L005 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

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

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vapor degreaser with refrigeration device and reduced room draft	OAC rule 3745-31-05 (PTI 01-6328)	OC emissions shall not exceed 5.99 tons/year.

2. **Additional Terms and Conditions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

- 1. The permittee shall maintain records of the total annual liquid volume of cleaning solvent employed each year

(gallons) and the total annual liquid volume of cleaning solvent sent off site as waste (gallons).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit an annual report which summarizes the annual total OC emissions as calculated according to the "Testing Requirements" section of this permit. This report shall be submitted to the Ohio EPA, Central District Office by February 1 of each year and shall cover the operations of the solvent cleaning machine for the previous calendar year.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 of this permit shall be determined in accordance with the following method:

Emission Limitation:
5.99 tons/year OC emissions

Applicable Compliance Method:
To determine the actual organic compound emission rate, the following equation shall be used:

$$E = (Ls - Lw) \times D / 2000$$

E = organic compound emissions rate (tons/year)

Ls = liquid volume of cleaning solvent employed each year (gallons)

Lw = liquid volume of cleaning solvent sent off site as waste (gallons)

D = density of cleaning solvent (pounds/gallon)

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual organic compound emission rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L006 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vapor degreaser with refrigeration device and idling and downtime mode cover	40 CFR 63.463 OAC rule 3745-21-09(O)(6)(b)	See Additional Terms and Conditions 2.a thru 2.h and Sections II, III, IV and V. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) thru (O)(5). See Additional Term and Condition 2.i.

OAC rule 3745-31-05
(PTI 01-6858)

0.41 lb/hr of organic compounds (OC)

2. Additional Terms and Conditions

- a. The solvent cleaning machine shall maintain an idling emission rate of 0.22 kilogram per hour per square meter (0.045 pound per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and 40 CFR 63, Appendix A.
- b. The permittee shall operate the solvent cleaning machine within the monitoring parameters measured during the idling emission rate test. These parameters are:
 - i. The temperature, as measured at the center of the air blanket, less than 60 degrees Fahrenheit; and
 - ii. The windspeed across the top of the freeboard area of the solvent cleaning machine not greater than zero (0) feet/minute.

In accordance with 40 CFR 63.468(d)(6)(iv)(B), the results of the idling emission rate test shall be used to demonstrate compliance with the idling emission limit. The idling emission rate test was conducted on February 5, 1997 by Finishing Equipment, Inc. on the same model solvent cleaning machine used at the facility (Finishing Equipment, Inc. Model XLE1-RB3). The results of this test demonstrated compliance with the idling emission limit.
- c. The permittee shall ensure that the idling and downtime mode cover is in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes and other defects.
- d. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
- e. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- f. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- g. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- h. The solvent cleaning machine shall have a primary condenser.
- i. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for VOC.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*****

II. Operational Restrictions

1.
 - a. The parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
 - b. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - c. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA, Central District Office.
 - d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
 - f. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - g. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - h. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA, Central District Office to achieve the same or better results as those recommended by the manufacturer.
 - i. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating

- procedures in 40 CFR Part 63, Appendix A if requested during an inspection by the Ohio EPA, Central District Office.
- j. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
 - k. Sponges, fabric, wood, and paper products shall not be cleaned.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described below:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
 - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the satisfaction of the Ohio EPA, Central District Office in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - c. Records of the halogenated hazardous air pollutant (HAP) solvent content for the solvent used in the solvent cleaning machine.
 - d. Records of the idling emission rate test, including the idling emission rate and values of the monitoring parameters measured during the test.
3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
 - a. The results of control device monitoring required in this section of the permit.
 - b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
5. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
 - a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current in the enclosure by slowly rotating a velometer or similar device inside the entrance to the enclosure until the maximum speed is located.
 - ii. Record the maximum speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
 - a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463(d)(10)."
 - b. An estimate of solvent consumption during the reporting period.

2. The permittee shall submit an exceedance report on a semiannual basis. The written reports shall be submitted every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If the temperature of the chilled air blanket, measured at the center of the air blanket, exceeds 60 degrees Fahrenheit, and no correction was made within 15 days of detection, or if operating conditions were established under which the wind speed exceeded zero (0) feet/minute and no correction was made within 15 days of detection, or if the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection 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 Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office 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 contain the following:
- 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.
 - If no exceedance has occurred, a statement to that effect shall be submitted.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

- The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
 - Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$
 Where:
 - PTE_i = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).
 - H_i = hours of operation for solvent cleaning machine i (hours per year).
 - = 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.
 - W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).
 - = 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.
 - = 1.12 kilograms per square meter per hour for in-line cleaning machines. SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.
 - Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$
 Where:
 - SAI = the solvent/air interface area (square meters).
 - Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).
 - Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
- Compliance with the 0.41 pound OC/hr limit is demonstrated based on the maximum allowable OC idling emission limit of 0.22 kilogram per hour per square meter (0.045 pound per hour per square foot) of solvent/air interface area specified in 40 CFR 63.463(b)(1)(ii) multiplied by the Vapor Air Interface (VAI) area of L006 (9.06 square feet) as follows:

$$(0.045 \text{ pound OC/per hour - square foot}) \times (9.06 \text{ square foot}) = 0.41 \text{ pound OC/hr}$$

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0180010110 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 0180010110 Emissions Unit ID: L006 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vapor degreaser with refrigeration device and idling and downtime mode cover	OAC rule 3745-31-05 (PTI 01-6858)	OC emissions shall not exceed 1.8 tons/year.

2. Additional Terms and Conditions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the total annual liquid volume of cleaning solvent employed each year (gallons) and the total annual liquid volume of cleaning solvent sent off site as waste (gallons).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit an annual report which summarizes the annual total OC emissions as calculated according to the "Testing Requirements" section of this permit. This report shall be submitted to the Ohio EPA, Central District Office by February 1 of each year and shall cover the operations of the solvent cleaning machine for the previous calendar year.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. Compliance with the emission limitation of 1.8 tons OC/year is demonstrated based on the maximum allowable OC idling emission limit of 0.22 kilogram per hour per square meter (0.045 pound per hour per square feet) of solvent/air interface area specified in 40 CFR 63.463(b)(1)(ii) and the Vapor Air Interface (VAI) area of L006 (9.06 square foot) as follows:

$$(0.045 \text{ pound OC/per hour} - \text{square foot}) \times (9.06 \text{ square foot}) \times (8760 \text{ hours of operation/yr}) \times (\text{ton}/2000 \text{ pounds}) = 1.8 \text{ tons OC/yr}$$

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. None