



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/15/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

02-04-01-0288
Safety-Kleen (PPM), Inc.
Kevin Gozzard Mr.
1302 WEST 38TH STREET
ASHTABULA, OH 44004

Dear Kevin Gozzard:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Northeast District Office.

Very truly yours,

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

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 05/15/02	Effective Date: 05/15/02	Expiration Date: 05/15/07
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This document constitutes issuance of a Title V permit for Facility ID: 02-04-01-0288 to:
 Safety-Kleen (PPM), Inc.
 Safety-Kleen (PPM), Inc.
 1302 West 38th Street
 ASHTABULA, OH 44004-5434

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

L001 (Primary Degreas) Primary Degreaser	L006 (Tumbler No 3) Tumbler No 3 for cold cleaning PCB transformer parts	P004 (TCE Still No 2) TCE still for solvent recovery, 400 gph
L004 (Tumbler No 1) Tumbler No 1 for cold cleaning PCB transformer parts	P003 (TCE Still No 1) TCE still for solvent recovery, 300 gph	P005 (TCE Still No 3) TCE still for solvent recovery, 400 gph
L005 (Tumbler No 2) Tumbler No 2 for cold cleaning PCB transformer parts		

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087
 (330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

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

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based

on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a

written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This Title V is for equipment to be used in the decontamination procedures for electrical transformers which have been drained, to the extent possible, of PCB laden oils.

This activity is being conducted under authorization from the United States EPA, Region V.

Any change in the status of said federal authorization shall be immediately reported to the Ohio EPA Northeast District Office.

2. The MACT rule, 40 CFR Part 63, Subpart T, was modified on December 3, 1999 to exempt PCB transformer cleaning machines from the Section 63.462(c)(8) prohibition on the cleaning of absorbent materials (sponges, fabric, wood and paper products) if those materials are within transformers, and if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal site permit issued in accordance with the Toxic Substances Control Act. Therefore, emissions units L003, L004 and L005, the batch cold cleaning machines, are exempt from the requirements of Section 63.462(c)(8) of Subpart T.

B. State Only Enforceable Section

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

T001 - Storage Tank No. 1, 2,000-gallon capacity (PTI # 02-2507).

T002 - Storage Tank No. 2, 1,000-gallon capacity (PTI # 02-2507).

T003 - Storage Tank No. 3, 3,500-gallon capacity.

T004 - Storage Tank No. 4, 3,500-gallon capacity.

T005 - Storage Tank No. 5, 8,000-gallon capacity.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Primary Degreas (L001)

Activity Description: Primary Degreaser

A. State and Federally Enforceable Section

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>
Primary degreaser using trichloroethylene solvent (This unit is a batch cold cleaning machine, immersion type.)	OAC rule 3745-31-05 PTI 02-2507	15.33 tons per year of volatile organic compounds. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T, and OAC rule 3745-21-09(O).
	40 CFR Part 63, Subpart T OAC rule 3745-21-09(O)(2)	See additional terms and conditions.

2. Additional Terms and Conditions

- 2.a The cold cleaner shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and shall have a freeboard ratio of 0.75 or greater.
- 2.b The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
- 2.c The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

II. Operational Restrictions

1. The permittee shall comply with the following work and operational practice requirements:
 - a. All waste solvent shall be collected and stored in closed containers. Each closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - b. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - c. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - d. The permittee shall ensure that the solvent level does not exceed the fill line.
 - e. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (1) (a) above.
 - f. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - g. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - h. Sponges, fabric, wood, and paper products shall not be cleaned.
2. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall maintain an annual record that lists the name of each degreasing solvent utilized in the emissions unit, the number of gallons employed, the density (pounds per gallon) of each solvent, and the amount of waste solvent sent off site to a waste treatment facility (TSDf). The permittee shall also maintain records of the calculated total VOC emissions from all degreasing solvents employed during each calendar year.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA Northeast District Office that specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. Each report shall be submitted by January 31 of each year.

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:

$$PTE_i = H_i \times W_i \times SAI_i$$

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).

H_i = 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).

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

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

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

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

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

Where:

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

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

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

V. Testing Requirements (continued)

2. Compliance with the emission limitation in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation: 15.33 tons/year of VOC

Applicable Compliance Method

To determine the actual VOC emission rate, the following equation shall be used:

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

E = VOC emission rate (tons per 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 per 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 emissions rate shall be determined by summing the annual organic compound emission rates for all cleaning solvents.

VI. Miscellaneous Requirements

1. This permit to operate is for equipment to be used in the decontamination procedures for electrical transformers which have been drained, to the extent possible, of PCB laden oils.

This activity is being conducted under authorization from the United States EPA, Region V.

Any change in the status of said federal authorization shall be immediately reported to the Ohio EPA Northeast District Office.

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tumbler No 1 (L004)

Activity Description: Tumbler No 1 for cold cleaning PCB transformer parts

A. State and Federally Enforceable Section

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>
Tumbler No. 1 - a custom- designed trichloroethylene solvent, remote reservoir, batch cold cleaner for PCB transformer parts (Parts are loaded into the tumbler basket which is then loaded into the empty cold cleaner. The cover is closed and TCE solvent is pumped in and the tumbler is operated. At the end of the cleaning cycle, the solvent is pumped out to storage, and a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is then opened and the tumbler basket is removed.)	OAC rule 3745-31-05(A)(3) (PTI # 02-13770)	See Section A.I.2.b below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T, and OAC rule 3745-21-09(O).
	40 CFR Part 63,Subpart T	See additional terms and conditions below.
	OAC rule 3745-21-09(O)(2)	See section A.I.2.d.

2. Additional Terms and Conditions

- 2.a The cold cleaner shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal.
- 2.b The permittee shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- 2.c Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.d Pursuant to OAC rule 3745-21-09(O)(6)(b), OAC rules 3745-21-09(O)(2) through (O)(5) shall not apply to this solvent metal cleaning operation as it is subject to Subpart T of 40 CFR part 63, and the requirements of that Subpart are specified in the terms and conditions of this Title V permit.

II. Operational Restrictions

1. The permittee shall comply with the following work and operational practice requirements:
 - a. All waste solvent shall be collected and stored in a closed container. The closed container may contain a device that allows pressure relief, so long as liquid solvent cannot drain from the container.
 - b. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - c. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - d. The permittee shall ensure that the solvent level does not exceed the fill line.
 - e. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (1) (a) above.
 - f. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - g. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - h. Sponges, fabric, wood, and paper products shall not be cleaned.
2. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
3. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
4. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
5. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain an annual record that lists the name of each degreasing solvent utilized in the emissions unit, the number of gallons employed, the density (pounds per gallon) of each solvent, and the amount of waste solvent sent off site to a waste treatment facility (TSDF). The permittee shall also maintain records of the calculated total VOC emissions from all degreasing solvents employed during each calendar year.
3. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA Northeast District Office that specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005, combined, for the previous calendar year. Each report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC from emissions units L004, L005, L006, P003, P004 and P005, combined.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacities.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tumbler No 2 (L005)

Activity Description: Tumbler No 2 for cold cleaning PCB transformer parts

A. State and Federally Enforceable Section

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>
Tumbler No. 2 - a custom- designed trichloroethylene solvent, remote reservoir, batch cold cleaner for PCB transformer parts (Parts are loaded into the tumbler basket which is then loaded into the empty cold cleaner. The cover is closed and TCE solvent is pumped in and the tumbler is operated. At the end of the cleaning cycle, the solvent is pumped out to storage, and a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is then opened and the tumbler basket is removed.)	OAC rule 3745-31-05(A)(3) (PTI # 02-13770)	See Section A.I.2.b below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T, and OAC rule 3745-21-09(O).
	40 CFR Part 63, Subpart T	See additional terms and conditions below.
	OAC rule 3745-21-09(O)(2)	See section A.I.2.d.

2. Additional Terms and Conditions

- 2.a The cold cleaner shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal.
- 2.b The permittee shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- 2.c Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.d Pursuant to OAC rule 3745-21-09(O)(6)(b), OAC rules 3745-21-09(O)(2) through (O)(5) shall not apply to this solvent metal cleaning operation as it is subject to Subpart T of 40 CFR part 63, and the requirements of that Subpart are specified in the terms and conditions of this Title V permit.

II. Operational Restrictions

1. The permittee shall comply with the following work and operational practice requirements:
 - a. All waste solvent shall be collected and stored in a closed container. The closed container may contain a device that allows pressure relief, so long as liquid solvent cannot drain from the container.
 - b. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - c. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - d. The permittee shall ensure that the solvent level does not exceed the fill line.
 - e. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (1) (a) above.
 - f. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - g. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - h. Sponges, fabric, wood, and paper products shall not be cleaned.
2. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
3. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
4. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
5. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain an annual record that lists the name of each degreasing solvent utilized in the emissions unit, the number of gallons employed, the density (pounds per gallon) of each solvent, and the amount of waste solvent sent off site to a waste treatment facility (TSDf). The permittee shall also maintain records of the calculated total VOC emissions from all degreasing solvents employed during each calendar year.
3. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA Northeast District Office that specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005, combined, for the previous calendar year. Each report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC from emissions units L004, L005, L006, P003, P004 and P005, combined.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacities.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tumbler No 3 (L006)

Activity Description: Tumbler No 3 for cold cleaning PCB transformer parts

A. State and Federally Enforceable Section

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>
Tumbler No. 3 - a custom- designed trichloroethylene solvent, remote reservoir, batch cold cleaner for PCB transformer parts (Parts are loaded into the tumbler basket which is then loaded into the empty cold cleaner. The cover is closed and TCE solvent is pumped in and the tumbler is operated. At the end of the cleaning cycle, the solvent is pumped out to storage, and a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is then opened and the tumbler basket is removed.)	OAC rule 3745-31-05(A)(3) (PTI # 02-13770)	See Section A.I.2.b below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T, and OAC rule 3745-21-09(O).
	40 CFR Part 63, Subpart T	See additional terms and conditions below.
	OAC rule 3745-21-09(O)(2)	See section A.I.2.d.

2. Additional Terms and Conditions

- 2.a The cold cleaner shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal.
- 2.b The permittee shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- 2.c Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.d Pursuant to OAC rule 3745-21-09(O)(6)(b), OAC rules 3745-21-09(O)(2) through (O)(5) shall not apply to this solvent metal cleaning operation as it is subject to Subpart T of 40 CFR part 63, and the requirements of that Subpart are specified in the terms and conditions of this Title V permit.

II. Operational Restrictions

1. The permittee shall comply with the following work and operational practice requirements:
 - a. All waste solvent shall be collected and stored in a closed container. The closed container may contain a device that allows pressure relief, so long as liquid solvent cannot drain from the container.
 - b. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - c. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - d. The permittee shall ensure that the solvent level does not exceed the fill line.
 - e. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (1) (a) above.
 - f. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - g. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - h. Sponges, fabric, wood, and paper products shall not be cleaned.
2. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
3. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
4. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
5. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain an annual record that lists the name of each degreasing solvent utilized in the emissions unit, the number of gallons employed, the density (pounds per gallon) of each solvent, and the amount of waste solvent sent off site to a waste treatment facility (TSDf). The permittee shall also maintain records of the calculated total VOC emissions from all degreasing solvents employed during each calendar year.
3. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA Northeast District Office that specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005, combined, for the previous calendar year. Each report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC from emissions units L004, L005, L006, P003, P004 and P005, combined.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacities.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: TCE Still No 1 (P003)

Activity Description: TCE still for solvent recovery, 300 gph

A. State and Federally Enforceable Section

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>
TCE Still No. 1 for solvent recovery, with a maximum production capacity of 300 gallons per hour.	OAC rule 3745-31-05(A)(3) (PTI # 02-13770) OAC rule 3745-21-07(G)(2)	See additional terms and conditions below. The organic compound emission limitation specified in this rule is less stringent than the organic compound emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.b Trichloroethylene (TCE) solvent is a photochemically reactive material as defined in OAC rule 3745-21-01.

II. Operational Restrictions

1. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
2. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
3. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit an annual report to the Ohio EPA Northeast District Office which specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005 for the previous calendar year. The report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the adsorber exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: TCE Still No 2 (P004)

Activity Description: TCE still for solvent recovery, 400 gph

A. State and Federally Enforceable Section

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>
TCE Still No. 2 for solvent recovery, with a maximum production capacity of 300 gallons per hour.	OAC rule 3745-31-05(A)(3) (PTI # 02-13770)	See additional terms and conditions below.
	OAC rule 3745-21-07(G)(2)	The organic compound emission limitation specified in this rule is less stringent than the organic compound emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.b Trichloroethylene (TCE) solvent is a photochemically reactive material as defined in OAC rule 3745-21-01.

II. Operational Restrictions

1. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
2. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
3. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit an annual report to the Ohio EPA Northeast District Office which specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005 for the previous calendar year. The report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the adsorber exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: TCE Still No 3 (P005)

Activity Description: TCE still for solvent recovery, 400 gph

A. State and Federally Enforceable Section

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>
TCE Still No. 3 for solvent recovery, with a maximum production capacity of 300 gallons per hour.	OAC rule 3745-31-05(A)(3) (PTI # 02-13770)	See additional terms and conditions below.
	OAC rule 3745-21-07(G)(2)	The organic compound emission limitation specified in this rule is less stringent than the organic compound emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a Emissions units L004, L005, L006, P003, P004 and P005 shall be controlled by a common carbon adsorption unit air pollution control device. VOC emissions from said control device shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.b Trichloroethylene (TCE) solvent is a photochemically reactive material as defined in OAC rule 3745-21-01.

II. Operational Restrictions

1. This emissions unit shall only be operated in conjunction with the associated carbon adsorption air pollution control device.
2. The average VOC concentration in the exhaust gases from the carbon adsorption system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) that is 20% greater than the average concentration documented during the initial emission test that demonstrates that this emissions unit is in compliance.
3. The carbon adsorption air pollution control device shall maintain, at all times, a 97%, by weight, inlet/outlet VOC emission control efficiency.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. The average exhaust gas flow rate, temperature, and VOC concentration (ppm) for the exhaust gases from the carbon adsorption system during each of the 8 3-hour blocks of time during the day.
- c. The daily VOC emission rate, in lbs per day.

IV. Reporting Requirements

1. The permittee shall submit an annual report to the Ohio EPA Northeast District Office which specify the total volatile organic compound emissions from emissions units L004, L005, L006, P003, P004 and P005 for the previous calendar year. The report shall be submitted by January 31 of each year.
2. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the adsorber exceeded the concentration limitation specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing an exceedance of the daily VOC emission limitation of 21.23 lbs/day.

V. Testing Requirements

1. Emission Limitation
21.23 lbs per day and 2.9 tons per year mass emission rates of VOC.

The continuous VOC monitoring data shall be used to demonstrate compliance with the daily emission limit. The permittee shall sum the results of the daily VOC monitoring data for each day of operation during each calendar year and then divide by 2,000 lbs/ton to calculate the annual emission rate in tons.

2. Emission Limitation
The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

The permittee shall conduct, or have conducted, VOC inlet/outlet emissions testing to demonstrate compliance with the 97%, by weight, control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Method 18.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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