

Facility ID: 0247030987 Issuance type: Title V Proposed Permit

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

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

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

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

#### 1. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart T

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Appendix C of 40 CFR Part 63, Subpart T:

63.1(a)(1)-(3);  
63.1(a)(4);  
63.1(a)(6)-(8);  
63.1(a)(10);  
63.1(a)(12)-(14);  
63.1(b)(2);  
63.1(c)(1);  
63.1(c)(2);  
63.1(c)(4);  
63.1(c)(5);  
63.1(e);  
63.2;  
63.3(a)-(c);  
63.4(a)(1)-(3);  
63.4(a)(5);  
63.4(b)-(c);  
63.5(a)(1);  
63.5(a)(2);  
63.5(b)(1);  
63.5(b)(4)-(6);  
63.6(a);  
63.6(b)(1)-(5);  
63.6(c)(1)-(2);  
63.6(c)(5);  
63.6(e)(1)-(2);  
63.6(f)-(g);  
63.6(i)(1)-(14);  
63.6(i)(16);  
63.6(j);  
63.7(a);  
63.7(b);  
63.7(c)(1);  
63.7(e);  
63.7(f);  
63.7(g);  
63.8(a)-(b);  
63.8(f);  
63.9(a)(1)-(4);  
63.9(b)(1);  
63.9(b)(2);  
63.9(b)(3);  
63.9(b)(5);  
63.9(c);  
63.9(d);  
63.9(e);  
63.9(i);  
63.9(j);

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63.10(a);  
63.10(d)(1);  
63.10(f);  
63.11(a);  
63.12(a)-(c);  
63.13(a)-(c); and

63.15(a)-(b).

The following emissions unit is subject to the aforementioned requirements: L001.

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**b State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

K001 - glue machine no. 1;  
K002 - glue machine no. 2;  
K003 - gritting machine no. 1;  
K004 - gritting machine no. 2;  
Z001 - forming operations;  
Z002 - dry machining;  
Z003 - 4 space heaters;  
Z004 - 6 space heaters; and  
Z005 - maintenance welding.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0247030987 Emissions Unit ID: L001 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
open top vapor degreaser using trichloroethylene	OAC rule 3745-31-05(A)(3) (PTI 02-19,646)	8.05 tons VOC (trichloroethylene {TCE}) per year
	40 CFR Part 63, Subpart T	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T. 150 kg TCE/m <sup>2</sup> /month, as a 3-month rolling average. See Section A.I.2.a.
	OAC rule 3745-21-09(O)(3)	In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09 (O)(3) shall not apply to this emissions unit. See Section A.I.2.b below.

**2. Additional Terms and Conditions**

- a. The permittee shall demonstrate compliance with 40 CFR Part 63, Subpart T, by using the alternative standard emission limit requirement found in 63.464(a)(1). The permittee shall ensure that the monthly trichloroethylene emissions from the solvent cleaning machine do not exceed 150 kilograms/square meter/month, as a 3-month rolling average; this is equivalent to 1,341.4 lbs TCE/month, based on a 3-month rolling average.
- (a) [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]
- b. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O)(6)(b) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR Part 63, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The U.S. EPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of U.S. EPA approval of the rule citation as a revision to the Ohio SIP for VOC.

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**II. Operational Restrictions**

1. None

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

1. The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.  
[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]
2. The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 150 kilograms/square meter/month on a monthly basis as follows:
  - a. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent,

recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, or as close to that fill line as possible by adding solvent in full 55 gallon drum increments, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

- b. The permittee shall on the first operating day of the month comply with the following:
- i. using the records of solvent additions and removals for the previous monthly reporting period, determine trichloroethylene emissions using the equation specified in Section A.V.1;
  - ii. determine the total amount of trichloroethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms of solvent per month) as specified in Section A.V.1.a of this permit; and
  - iii. determine the monthly rolling average emissions for the 3-month period ending with the most recent reporting period using the equation specified in Section A.V.1.b.

This compliance method may be abandoned and an alternative compliance method from 40 CFR 63.463 can be used if approved by the Ohio EPA, Northeast District Office, or if U.S. EPA provides written approval of an alternate standard.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

3. The permittee shall maintain the following records either in electronic or written form for a period of five years:
- a. the dates and amounts of trichloroethylene, in kilograms (kg) and gallons, that are added to the solvent cleaning machine;
  - b. the trichloroethylene composition of wastes removed from the cleaning machine, using U.S. EPA reference test Method 25d or engineering calculations; and
  - c. calculation sheets showing how the monthly emissions and the rolling 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

4. The permittee shall maintain an annual record of the number of gallons of TCE used and the density (pounds per gallon). The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).

[Authority for term: PTI 02-19,646 and OAC rule 3745-77-07(C)(1)]

5. As required in 40 CFR 63.465(e) the permittee shall determine the potential to emit. The potential to emit (PTE) for this emissions unit shall be documented as follows:

$$PTE = H \times W \times SAI$$

where:

PTE = potential to emit (kg of TCE/yr)

H= hours of operation (8760 hrs/yr)

W = the working mode uncontrolled emission rate (1.95 kg/m<sup>2</sup>/hr)

SAI = solvent/air interface area of solvent cleaning machine (4.06 m<sup>2</sup>)

therefore:

$$PTE = 8760 \text{ hrs/yr} \times 1.95 \text{ kg/m}^2/\text{hr} \times 4.06 \text{ m}^2 = 69,352.9 \text{ kg/yr}$$

$$PTE = 69,352.9 \text{ kg/yr} \times 2.2046 \text{ lbs/kg} \times 1 \text{ ton}/2000 \text{ lbs} = 76.4 \text{ tons/yr}$$

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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#### IV. Reporting Requirements

1. The permittee shall submit an annual solvent emissions report by February 1 of each year. The report shall cover the previous calendar year and shall be submitted to the Ohio EPA, Northeast District Office. The report shall contain the following:
  - a. the size (solvent/air interface area) and type of the solvent cleaning machine;
  - b. the TCE consumption for the solvent cleaning machine, in kilograms for each calendar month;
  - c. the average monthly TCE consumption, for the year, in kilograms per month;
  - d. the 3-month rolling average TCE emissions estimates calculated for each calendar month, in kilograms of

TCE per meter squared per month, calculated using the method described in Section A.V.1 of this permit; and

e. the total TCE emissions for the calendar year.

[Authority for term: 40 CFR Part 63, Subpart T, PTI 02-19646 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit an exceedance report on a semiannual basis. If the trichloroethylene 3-month rolling average of 150 kilograms/square meter/month is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Ohio EPA, Northeast District Office). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) the emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Ohio EPA, Northeast District Office) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463(e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and

b. if no exceedance has occurred, a statement to that effect shall be submitted.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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**V. Testing Requirements**

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

a. Emission Limitation:

150 kg TCE/m<sup>2</sup>/month, as a 3-month rolling average

Applicable Compliance Method:

i. Using the records of all solvent additions and removals for each month, as required in the "Monitoring and/or Record Keeping Requirements" section of this permit, the solvent emission rate (E<sub>i</sub>) shall be calculated using the equation below:

$$E_i = (SA_i - LSR_i - SSR_i) / AREA_i$$

Where:

E<sub>i</sub> = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period "i" (kilograms of solvent per square meter of solvent/air interface area/month).

SA<sub>i</sub> = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period "i" (kilograms of TCE per month).

LSR<sub>i</sub> = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period "i" (kilograms of TCE per month).

SSR<sub>i</sub> = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, during the most recent monthly reporting period "i" (kilograms of TCE per month), determined from tests conducted using U. S. EPA reference test Method 25d or from engineering calculations, which shall be included in the compliance report.

AREA<sub>i</sub> = the solvent/air interface area of the solvent cleaning machine (square meters).

- a. ii. The monthly rolling average TCE emissions (E<sub>Aj</sub>), shall be calculated for each 3-month period, ending with the most recent reporting period, using the equation below:

E<sub>Aj</sub> = the sum, from j = 1 to j = 3, of (E<sub>i</sub>)<sub>j</sub>, divided by 3,

where:

E<sub>Aj</sub> = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month).

E<sub>i</sub> = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month).

j = 1 = the most recent monthly reporting period.

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

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

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

8.05 tons VOC (trichloroethylene) per year

Applicable Compliance Method:

To determine the annual volatile organic compound emission rate, the following equation shall be used:

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

Where:

E = volatile organic compound emission rate in tons per year

L<sub>s</sub> = liquid volume of cleaning solvent employed each year (gallons)

L<sub>w</sub> = liquid volume of cleaning solvent sent off-site as waste (gallons)

D = density of cleaning solvent (pounds/gallon).

[Authority for term: PTI 02-19,646 and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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

1. None.

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

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None