



State of Ohio Environmental Protection Agency

RE: **DRAFT PERMIT TO INSTALL ASHTABULA COUNTY** **CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov. Center

**Application No: 02-13770**

**DATE:** 7/11/00

Safety-Kleen (PPM) Inc  
Kevin Gozzard  
1302 West 38th St  
Ashtabula, OH 44004

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2600** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA  
PA

NEDO  
Eastgate Dev & Trans Study

NY



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

**DRAFT PERMIT TO INSTALL 02-13770**

Application Number: 02-13770  
APS Premise Number: 0204010288  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Safety-Kleen (PPM) Inc  
Person to Contact: Kevin Gozzard  
Address: 1302 West 38th St  
Ashtabula, OH 44004

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1302 West 38th St  
Ashtabula, Ohio**

Description of proposed emissions unit(s):

**Solvent metal cleaning cold cleaning equipment using trichloroethylene controlled by a carbon adsorption system.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Safety-Kleen (PPM) Inc

Facility ID: 0204010288

PTI Application: 02-13770

Issued: To be entered upon final issuance

**Part I - GENERAL TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping 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.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - 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 recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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. 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.
- 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.

## **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, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **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.

## **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.

## **5. Severability Clause**

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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.

**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. 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.

**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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

**8. 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

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shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- 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 ORC section 3704.08.
  - 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.

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#### 10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.)

**3. 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.

**4. 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.

**5. Termination of Permit To Install**

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This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **6. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### **7. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **8. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **9. Best Available Technology**

**Safety-Kleen (PPM) Inc**

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As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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**10. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**11. 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.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Volatile Organic Compounds	4.9

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. This permit to install 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.

Emissions units L003, L004 and L005, batch cold cleaning machines, listed in this permit are, therefore, exempt from the requirements of Section 63.462(c)(8) of Subpart T.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**Safety**

**PTI A**

Emissions Unit ID: L003

**Issued: To be entered upon final issuance**

**Part III -**

**SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
L003 - Dip tank; a custom designed trichloroethylene solvent metal, remote reservoir, batch cold cleaner for PCB transformer parts. Larger parts are loaded into the empty cold cleaner, the cover is closed and TCE solvent is sprayed over the parts, as the parts are cleaned, solvent is drained away to the remote reservoir. Cleaned parts are dripped dry to the remote reservoir and the cover is opened to remove them.	OAC rule 3745-31-05(A)(3)	No more than 40.0 lbs per hour and 2.0 tons per year of VOC. See Section A.I.2. below.
	40 CFR Part 63, Subpart T	See Section A.I.2. below.
	OAC rule 3745-21-09(O)(2)	See Section A.I.2. below.

**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.

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- 2.c** The 40.0 lbs/hr allowable emission rate was calculated based upon the potential to emit (PTE) equation in Section 63.465(e)(1) of Subpart T.
- 2.d** Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5), the exemption allowed in accordance with OAC rule 3745-21-09(O)(6)(b) is not part of the federally approved SIP. The rule has been revised by the Ohio EPA to specify that a solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5), provided the requirements of Subpart T are specified in the terms and conditions of the Title V permit. The Ohio EPA has received confirmation from the USEPA of the acceptability of the exemption; therefore, the requirements of OAC rule 3745-21-09(O) will not be cited in the 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 closed containers. The 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.
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. To maintain compliance with the above annual VOC emission limit the permittee shall restrict the operation of this emissions unit to 100 hours per rolling 12 month period.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:
  - a. The types of solvents employed in the cold cleaner.

**Safety****PTI A**

Emissions Unit ID: L003

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- b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall maintain daily records of the number of hours that this emissions unit was operated. Since the hourly emission limit is based upon the potential to emit (PTE) equation in Section 63.465(e)(1) of Subpart T, the permittee may assume the maximum emission rate per hour to be 40.0 lbs/hr in lieu of monitoring the actual emission rate.
3. The permittee shall maintain an annual record which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).

**IV. Reporting Requirements**

1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
  - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
  - c. The report shall include an estimate of the TCE consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), subpart A.
2. The permittee shall submit a compliance report no later than 150 days after startup. This report shall include the following information:
  - a. The name and address of the permittee.
  - b. The address (i.e., the physical location) of the solvent cleaning machine.
  - c. A statement signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.

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

## V. Testing Requirements

1. Emission Limitation  
 VOC emissions shall not exceed 40.0 lbs per hour.

Compliance shall be calculated using the following formula derived from Subpart T:

$$AER = W_i \times SAI \times 2.205 \text{ lbs/Kg}$$

where: AER= allowable hourly emission in lbs/hr

$W_i$ = the working mode uncontrolled emission rate, which is 1.95 Kg per square meter for cold cleaning machines.

SAI= the solvent air interface in square meters, which is 9.29 square meters, per the permit application.

2. Emission Limitation  
 VOC emissions shall not exceed 2.0 tons per year.

Applicable Compliance Method

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

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

E= organic compound emissions rate (tons/year)

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

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

D= density of cleaning solvent (pounds/gallon)

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

## VI. Miscellaneous Requirements

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**Safety**

**PTI A**

**Issued: To be entered upon final issuance**

None.

Emissions Unit ID: L003

**Safety**

**PTI A**

Emissions Unit ID: L003

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

**2.a** None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

**Safety  
PTI A**

Emissions Unit ID: L004

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
L004 - Tumbler No 1; a custom designed trichloroethylene solvent metal, 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, a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is the opened and the tumbler basket can be removed.	OAC rule 3745-31-05(A)(3)  40 CFR Part 63,Subpart T  OAC rule 3745-21-09(O)(2)	See Section A.I.2. below.  See Section A.I.2. below.  See Section A.I.2. below.

**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 unit shall not exceed 21.23 lbs per day and 2.9 tons per year.
- 2.d** Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5), the exemption allowed in accordance with OAC rule 3745-21-09(O)(6)(b) is not part of the federally approved SIP. The rule has been revised by the Ohio EPA to specify that a solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5), provided the requirements of Subpart T are specified in the terms and conditions of the Title V permit. The Ohio EPA has received confirmation from the USEPA of the acceptability of the exemption; therefore, the requirements of OAC rule 3745-21-09(O) will not be cited in the 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 closed containers. The 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.

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- 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.

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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 adsorber, for any 3-hour block of time shall not exceed a specific number, in ppm, to be determined later. Said number shall be a VOC concentration (ppm) that is 20% greater than the average concentration during the initial emission test that demonstrates that this emissions unit is in compliance.
5. The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

**III. Monitoring and/or Recordkeeping 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 which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).
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 absorber 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 VOC concentration in the exhaust gases from the absorber during each of the

Emissions Unit ID: L004

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 absorber exceeded the concentration limitation specified above.
3. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
  - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
  - c. The report shall include an estimate of the TCE consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), subpart A.
4. The permittee shall submit a compliance report no later than 150 days after startup. This report shall include the following information:
  - a. The name and address of the permittee.
  - b. The address (i.e., the physical location) of the solvent cleaning machine.
  - c. A statement signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.

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5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

**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.

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

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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.

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**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

**2.a** None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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Emissions Unit ID: L005

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
L005 - Tumbler No 2; a custom designed trichloroethylene solvent metal, 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, a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is the opened and the tumbler basket can be removed.	OAC rule 3745-31-05(A)(3)  40 CFR Part 63,Subpart T  OAC rule 3745-21-09(O)(2)	See Section A.I.2. below.  See Section A.I.2. below.  See Section A.I.2. below.

**2. Additional Terms and Conditions**

- 2.a The cold cleaner shall employ a tightly fitting fitting

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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

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Emissions Unit ID: L005

air  
pollution  
control  
device.  
VOC  
emissions from  
said unit  
shall not  
exceed  
21.23  
lbs per  
day and  
2.9 tons  
per  
year.

**2.d** Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5), the exemption allowed

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in accordance with OAC rule 3745-21-09(O)(6)(b) is not part of the federally approved SIP. The rule has been revised by the Ohio EPA to specify that a solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T is exempt from the requirements of OAC rule

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3745-21-09(O)(2)  
)  
through (O)(5), provide d the require ments of Subpart T are specifie d in the terms and conditio ns of the Title V permit. The Ohio EPA has received confirm ation from the USEPA of the accepta bility of the exempti on; therefor e, the require ments of OAC

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rule  
3745-21-  
09(O)  
will not  
be cited  
in the  
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 closed containers. The 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

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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

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(not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

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

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain records of the following information:
  - a. The types of solvents employed in the cold

Emissions Unit ID: L005

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 which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).
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 absorber 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.

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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 VOC concentration in the exhaust gases from the absorber 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

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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 absorber exceeded the concentration limitation specified above.
  
- 3. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing

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controls

b. The report shall include the anticipated compliance approach for the solvent cleaning machine

c. The report shall include an estimate of the TCE consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), subpart A.

4. The permittee shall submit a compliance report no later than 150 days after startup. This report shall include the following information:

a. The name and address of the permitte

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- e.
  - b. The address (i.e., the physical location ) of the solvent cleaning machine .
  - c. A statement signed by the owner or operator of the solvent cleaning machine , stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.
5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

## 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.

- ### 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).

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**Issued**

**Facility ID: 0204010288**

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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.

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**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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Emissions Unit ID: L006

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
L006 - Tumbler No 3; a custom designed trichloroethylene solvent metal, 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, a vacuum is pulled on the cold cleaner tank and exhausted to the carbon adsorption unit. The cover is the opened and the tumbler basket can be removed.	OAC rule 3745-31-05(A)(3)	See Section A.I.2. below.
	40 CFR Part 63,Subpart T	See Section A.I.2. below.
	OAC rule 3745-21-09(O)(2)	See Section A.I.2. below.

**2. Additional Terms and Conditions**

Emissions Unit ID: L006

**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 commo

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Emissions Unit ID: L006

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carbon  
adsorpti  
on unit  
air  
pollutio  
n  
control  
device.  
VOC  
emissio  
ns from  
said unit  
shall not  
exceed  
21.23  
lbs per  
day and  
2.9 tons  
per  
year.

**2.d** Although the requirements of OAC rule 3745-21-09(O) allow for an exemption from applicable requirements in OAC rule 3745-21-09(O)(2) through (O)(5),

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Emissions Unit ID: L006

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exempti  
on  
allowed  
in  
accorda  
nce with  
OAC  
rule  
3745-21-  
09(O)(6  
) (b) is  
not part  
of the  
federall  
y  
approve  
d SIP.  
The rule  
has  
been  
revised  
by the  
Ohio  
EPA to  
specify  
that a  
solvent  
metal  
cleaning  
operatio  
n which  
is  
subject  
to 40  
CFR  
Part 63,  
Subpart  
T is  
exempt  
from the

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Emissions Unit ID: L006

requirements of OAC rule 3745-21-09(O)(2) through (O)(5), provided the requirements of Subpart T are specified in the terms and conditions of the Title V permit. The Ohio EPA has received confirmation from the USEPA of the acceptability of the exemption; therefore

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e, the requirements of OAC rule 3745-21-09(O) will not be cited in the 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 closed containers. The 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

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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

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fluid  
stream  
(not a  
fine,  
atomize  
d, 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 adsorber, for any 3-hour block of time shall not exceed a specific number, in ppm, to be determined later. Said number shall be a VOC concentration (ppm) that is 20% greater than the average concentration during the initial emission test that demonstrates that this emissions unit is in compliance.
- 5. The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

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Facility ID: 0204010288

Emissions Unit ID: L006

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### III. Monitoring and/or Recordkeeping 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 which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).
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 absorber 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

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Emissions Unit ID: L006

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 VOC concentration in the exhaust gases from the absorber during each of the 8 3-hour blocks of time during

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Emissions Unit ID: L006

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 absorber exceeded the concentration limitation specified above.
3. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line,

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or cold  
in-line),  
solvent/  
air  
interfac  
e area,  
and  
existing  
controls  
.

b. The report shall include the  
anticipat  
ed  
compla  
nce  
approac  
h for the  
solvent  
cleaning  
machine  
.

c. The report shall include an estimate  
of the  
TCE  
consum  
ption  
for the  
solvent  
cleaning  
machine  
in lieu  
of the  
require  
ments  
of 40  
CFR  
63.5(d)(  
1)(ii)(H  
) ,

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subpart

A.

4. The permittee shall submit a compliance report no later than 150 days after startup. This report shall include the following information:
  - a. The name and address of the permittee.
  - b. The address (i.e., the physical location) of the solvent cleaning machine.
  - c. A statement signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.

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5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

**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.

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

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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.

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**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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Emissions Unit ID: P003

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P003 - TCE Still No 1 for solvent recovery with a maximum production capacity of 300 gallons per hour.	OAC rule 3745-31-05(A)(3) 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

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Facility ID: 0204010288

Emissions Unit ID: P003

air  
pollution  
control  
device.  
VOC  
emissions  
from  
said unit  
shall not  
exceed  
21.23  
lbs per  
day and  
2.9 tons  
per  
year.

2.b Trichloroethylene (TCE) solvent is a photochemically reactive organic compound as defined in OAC rule 3545-21-01.

**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 adsorber, for any 3-hour block of time shall not exceed a specific number, in ppm, to be determined later. Said number shall be a VOC concentration (ppm) that is 20% greater than the average concentration during the initial emission test that demonstrates that this emissions unit is in compliance.
3. The carbon adsorption air pollution control device shall be operated at a 97%, by weight, inlet/outlet VOC emission control efficiency.

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**III. Monitoring and/or Recordkeeping 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 absorber 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.

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- b. The average VOC concentration in the exhaust gases from the absorber 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 absorber exceeded the concentration limitation specified above.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

**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.

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

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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.

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**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

2.a None

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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Emissions Unit ID: P004

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P004 - TCE Still No 2 for solvent recovery with a maximum production capacity of 400 gallons per hour.	OAC rule 3745-31-05(A)(3)  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 adsorpti

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Emissions Unit ID: P004

on unit  
air  
pollutio  
n  
control  
device.  
VOC  
emissio  
ns from  
said unit  
shall not  
exceed  
21.23  
lbs per  
day and  
2.9 tons  
per  
year.

**2.b** Trichloroethylene (TCE) solvent is a photochemically reactive organic compound as defined in OAC rule 3545-21-01.

**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 adsorber, for any 3-hour block of time shall not exceed a specific number, in ppm, to be determined later. Said number shall be a VOC concentration (ppm) that is 20% greater than the average concentration during the initial emission test that demonstrates that this emissions unit is in compliance.

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**Facility ID: 0204010288**

Emissions Unit ID: P004

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

### III. Monitoring and/or Recordkeeping 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 absorber 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 VOC concentration in the exhaust gases

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Emissions Unit ID: P004

from the  
absorber  
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 absorber exceeded the concentration limitation specified above.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

**V. Testing Requirements**

1. Emission Limitation

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Emissions Unit ID: P004

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.

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

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Emissions Unit ID: P004

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**

1. None.

**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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Emissions Unit ID: P005

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>
P005 - TCE Still No 3 for solvent recovery with a maximum production capacity of 400 gallons per hour.	OAC rule 3745-31-05(A)(3)  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 adsorpti

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Emissions Unit ID: P005

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air  
pollutio  
n  
control  
device.  
VOC  
emissio  
ns from  
said unit  
shall not  
exceed  
21.23  
lbs per  
day and  
2.9 tons  
per  
year.

**2.b** Trichloroethylene (TCE) solvent is a photochemically reactive organic compound as defined in OAC rule 3545-21-01.

**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 adsorber, for any 3-hour block of time shall not exceed a specific number, in ppm, to be determined later. Said number shall be a VOC concentration (ppm) that is 20% greater than the average concentration during the initial emission test that demonstrates that this emissions unit is in compliance.

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Emissions Unit ID: P005

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

**III. Monitoring and/or Recordkeeping 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 absorber 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

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 Issued

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Emissions Unit ID: P005  
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 associat  
 ed  
 emissio  
 ns unit.

- b. The average VOC concentration in the exhaust gases from the absorber 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 absorber exceeded the concentration limitation specified above.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing an exceedance of the daily emission limitation (i.e. in lbs/day VOC). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District

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Emissions Unit ID: P005

Office) within 45 days after the exceedance occurs.

**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.

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

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Emissions Unit ID: P005

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**

1. None.

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

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

- 1. The specific operations(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 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. Additional Terms and Conditions**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning equipment using trichloroethylene controlled by a carbon adsorption system CITY/TWP Ashtabula

SIC CODE 4953 SCC CODE 4-01-911-04 EMISSIONS UNIT ID L003

EMISSIONS UNIT DESCRIPTION Transformer dip tank; solvent metal, remote reservoir, cold cleaner.

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			40.0 lbs/hr	2.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?

Subpart T

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: compliance with MACT 40 CFR Part 63, Subpart T requirements and emissions limit listed.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ not applicable

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-01-911-04 EMISSIONS UNIT ID L004

EMISSIONS UNIT DESCRIPTION Tumbler No 1; solvent metal cold cleaner

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23 lbs/day	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?  
 Subpart T

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-01-911-04 EMISSIONS UNIT ID L005

EMISSIONS UNIT DESCRIPTION Tumbler No 2; solvent metal cold cleaner

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?  
Subpart T

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-01-911-04 EMISSIONS UNIT ID L006

EMISSIONS UNIT DESCRIPTION Tumbler No 3; solvent metal cold cleaner

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23 lbs/day	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?  
 Subpart T

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770

Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc \*L007 REMOVED FROM ORIGINAL APPLICATION AT APPLICANT'S REOUEST.

FACILITY

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID L007\*

EMISSIONS UNIT DESCRIPTION Transformers preflush operation

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63,

NESHAP?

PSD?

OFFSET POLICY?

Subpart T

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-90-002-02 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION TCE Still No 1

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23 lbs/day	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?  
 Subpart T

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-90-002-02 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION TCE Still No 2

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23 lbs/day	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, Subpart T NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Enter Determination Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

**90 NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770 Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning CITY/TWP Ashtabula

Emissions Unit ID: P005

SIC CODE 4953 SCC CODE 4-90-002-02 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION TCE Still No 3

DATE INSTALLED upon PTI issuance.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			21.23 lbs/day	2.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63, NESHAP? PSD? OFFSET POLICY?  
 Subpart T

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Emissions units L004, L005, L006, P003, P004 & P005 shall be controlled by a common carbon adsorption unit/air pollution control device. VOC emissions from said unit shall not exceed 21.23 lbs/day and 2.9 tpy, total. The carbon adsorption unit shall be operated at a 97%, by wt., inlet/outlet VOC emission control efficiency.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ Not available

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**9 NEW SOURCE REVIEW FORM B**

PTI Number: 02-13770

Facility ID: 0204010288

FACILITY NAME Safety-Kleen (PPM) Inc

FACILITY DESCRIPTION Solvent metal cleaning cold cleaning

CITY/TWP Ashtabula

Emissions Unit ID: P005

\*\*\*\*\*REVISED 6/29/00\*\*\*\*\*

**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

**Emission calculations.**

**Please provide any additional permit specific notes as you deem necessary:**

Please note that the applicant requested that the annual emission limit for emissions unit no. L003 be restricted to 2.0 tpy based upon a 100 hours per year operation restriction at the 40.0 lbs/hour short term limit. The restriction is not a synthetic minor to avoid PSD rule review or MACT rule Subpart T, which is still applicable.

Safety-Kleen (PPM) is a Title 5 facility, major for HAPs, specifically for trichloroethylene. The facility's current PTE, prior to this PTI is ~46.0 tpy.

**Permit To Install Synthetic Minor Write-Up**

NONE

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

**PollutantTons Per Year**

**Volatile Organic Compounds4.9**