



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

3/22/2011

Jeff Grace
R.W. Screw Products, Inc.
PO BOX 310
Massillon, OH 44648

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576131761
Permit Number: P0107109
Permit Type: Renewal
County: Stark

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Canton Repository. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Canton; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

R.W. Screw Products, Inc. located in Massillon, Ohio is a manufacturer of precision screw machine parts. The facility uses emissions unit L001, an existing open top vapor degreaser (Baron-Blakeslee Model HL-384), to clean parts. The solvent employed in this process is trichloroethylene (CAS No. 79-01-6), which is a chemical on the Clean Air Act Amendments (CAAA) of 1990 List of Hazardous Air Pollutants (HAP).

3. Facility Emissions and Attainment Status:

R.W. Screw Products, Inc. is located in Stark County, which is in attainment with all National Ambient Air Quality Standards (NAAQS), with the exception of particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}). Volatile organic compounds (VOC), as trichloroethylene (TCE), are the only criteria pollutants emitted from the facility.

4. Source Emissions:

Trichloroethylene solvent usage is restricted to 1,430 gallons per rolling, 12-month period. The density of the TCE solvent is 12.17 pounds per gallon. Annual emissions are estimated by the following calculation (assuming worst-case 100% solvent lost to evaporation):

$$1430 \text{ gal TCE/yr} \times 12.17 \text{ lbs/gal} \times 1 \text{ ton}/2000 \text{ lbs} = 8.70 \text{ tons TCE/yr}$$

5. Conclusion:

Compliance with the rolling, 12-month material usage restriction and corresponding emissions limitation, along with the associated monitoring, recordkeeping and reporting requirements of this permit, will ensure the facility remains a synthetic minor, through OAC rule 3745-31-05(D), with respect to single HAP emissions and avoids Title V major source status. Issuance of federally enforceable permit-to-install and operate (FEPTIO) P0107109 is recommended.

6. Please provide additional notes or comments as necessary:

Draft issuance was selected because the initial federally enforceable permit (PTI 15-01403) did not include a process variable restriction in conjunction with the restricted PTE per U.S. EPA guidance.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Trichloroethylene	8.70

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
R.W. Screw Products, Inc.

Issue Date: 3/22/2011
Permit Number: P0107109
Permit Type: Renewal
Permit Description: Renewal permit for an open top vapor degreaser. Federally enforceable restrictions limit HAP emissions from trichloroethylene solvent below 10.0 tpy to avoid Title V.
Facility ID: 1576131761
Facility Location: R.W. Screw Products, Inc.
999 Oberline Road SW,
Massillon, OH 44647
Facility Description: Precision Turned Product Manufacturing

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Kelly Kanoza at Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544 or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
R.W. Screw Products, Inc.**

Facility ID:	1576131761
Permit Number:	P0107109
Permit Type:	Renewal
Issued:	3/22/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
R.W. Screw Products, Inc.

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Authorization

Facility ID: 1576131761
 Application Number(s): A0040600
 Permit Number: P0107109
 Permit Description: Renewal permit for an open top vapor degreaser. Federally enforceable restrictions limit HAP emissions from trichloroethylene solvent below 10.0 tpy to avoid Title V.
 Permit Type: Renewal
 Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 3/22/2011
 Effective Date: To be entered upon final issuance
 Expiration Date: To be entered upon final issuance
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

R.W. Screw Products, Inc.
 999 Oberline Road SW
 Massillon, OH 44647

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

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

Canton City Health Department
 420 Market Avenue
 Canton, OH 44702-1544
 (330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
 Director



Authorization (continued)

Permit Number: P0107109

Permit Description: Renewal permit for an open top vapor degreaser. Federally enforceable restrictions limit HAP emissions from trichloroethylene solvent below 10.0 tpy to avoid Title V.

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

Emissions Unit ID:	L001
Company Equipment ID:	Open Top Vapor Degreaser
Superseded Permit Number:	15-01403
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Canton City Health Department in accordance with OAC rule 3745-



15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install (PTI) issued in accordance with ORC 3704.03(F) and a permit-to-operate (PTO) issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) Unless other arrangements have been approved by the Director (the appropriate Ohio EPA District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. L001, Open Top Vapor Degreaser

Operations, Property and/or Equipment Description:

Trichloroethylene Open Top Vapor Degreaser (Baron-Blakeslee Model HL-384)

a) This permit document constitutes a permit-to-install (PTI) issued in accordance with ORC 3704.03(F) and a permit-to-operate (PTO) issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.73 ton per month and 8.70 tons per year of volatile organic compounds (VOC) as trichloroethylene (TCE). See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	8.70 tons of TCE per rolling, 12-month period See b)(2)b. and c)(1)
c.	OAC rule 3745-21-09(O)	Exempt. See b)(2)c.
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Appendix B to Subpart T of Part 63 lists the General Provisions Applicability to Subpart T
e.	40 CFR Part 63, Subpart T (40 CFR 63.460-471) See b)(2)d.	[63.463(a) and (b)] See b)(2)e., b)(2)f., and c)(2)

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements include compliance with 40 CFR Part 63, Subpart T.

b. The emissions of trichloroethylene (TCE) from this emissions unit shall not exceed 8.70 tons per year, based upon a rolling, 12-month summation of TCE

emissions. The federally enforceable limitation is based on the maximum TCE usage restriction under c)(1) of this permit, assuming worst-case 100% solvent lost to evaporation, and is being established for the purposes of avoiding Title V applicability for a single hazardous air pollutant (HAP).

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of TCE emissions, and the rolling, 12-month summation of TCE usage, upon issuance of this permit.

- c. Pursuant to OAC rule 3745-21-09(O)(6)(b), paragraphs (O)(2) through (O)(5) of this rule shall not apply to any solvent metal cleaning operation which is subject to 40 CFR Part 63, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions of a permit-to-install and operate (PTIO).
- d. In accordance with §63.460(a), this emissions unit is a batch vapor cleaning machine that uses trichloroethylene (CAS No. 79-01-6) solvent, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- e. The batch vapor cleaning machine, having a solvent/air interface area of 1.21 square meters (13 square feet) or less, shall employ Option 6 (freeboard refrigeration device, freeboard ratio of 1), as the chosen control combination selected from Table 1 of Subpart T.
- f. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
 - i. The vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - ii. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - iii. The vapor cleaning machine shall have a primary condenser.
 - iv. The solvent cleaning machine's automated parts handling system shall move the parts or parts baskets at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed), from the initial loading of parts through removal of cleaned parts.
 - v. The permittee shall use an idling and downtime mode cover, that shall be in place during the idling mode and during the downtime mode, unless either the solvent has been removed or maintenance or monitoring is being performed that requires the cover(s) to be removed.
- g. The terms and conditions for this emissions unit as specified in permit-to-install and operate (PTIO) P0107109 supersede all the terms and conditions specified

in PTI 15-01403, dated March 15, 2001, and PTO P0101409, dated May 28, 2003.

c) Operational Restrictions

- (1) The maximum annual trichloroethylene (TCE) usage shall not exceed 1,430 gallons based on a rolling, 12-month summation of TCE usage.
- (2) This emissions unit shall not employ a lip exhaust or any other exhaust system within the machine.
- (3) The permittee shall meet the following required work and operational practices:
 - a. Air disturbances across the solvent cleaning machine shall be controlled by using an idling and downtime mode cover, that shall be in place during the idling and downtime modes, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed. The cover shall be able to be readily opened or closed, shall completely cover the cleaning machine openings when in place, and shall be free of cracks, holes and other defects.
 - b. The solvent cleaning machine's automated parts handling system shall move the parts or parts baskets at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed).
 - c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the regulating agency.
 - e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
 - g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - i. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using alternative maintenance practices that have been demonstrated to the

satisfaction of the regulating agency (appropriate Ohio EPA District Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

- j. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A of 40 CFR Part 63 if requested during an inspection by the Director (appropriate Ohio EPA District Office or local air agency).
 - k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
 - l. Sponges, fabric, wood, paper products and/or other porous or absorbent material shall not be cleaned.
- (4) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance with 40 CFR 63.463, as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit; and these parameters shall meet the following requirements established in this permit:
- a. The permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
 - b. The permittee shall maintain a freeboard with a freeboard ratio greater than or equal to 1.0.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for the solvent cleaning machine. These records shall be kept for a period of not less than five years:
- a. the identification of the degreasing solvent employed;
 - b. the total amount, in gallons, of degreasing solvent used;
 - c. the total amount, in gallons, of waste solvent (solvent content only, excluding any solids and water) sent off site for disposal and/or reclamation;
 - d. the total monthly trichloroethylene emission rate, in tons per month;
 - e. the rolling, 12-month summation of the trichloroethylene usage, in gallons; and
 - f. the rolling, 12-month summation of the trichloroethylene emissions, in tons.
- (2) Using a thermometer or thermocouple, the permittee shall measure and record, on a weekly basis, the temperature at the center of the air blanket during the idling mode.

- (3) The permittee shall measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirement limitation. The date of record shall be included with the recorded measurements.
- (4) The permittee shall conduct a monthly visual inspection of the idling-mode/downtime cover(s) and shall maintain a record of the results. The records shall document that the cover is opening and closing properly, that it completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.
- (5) The permittee shall monitor the hoist speed as described below and maintain records of the results:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall document that the parts and parts basket does not occupy more than 50 percent of the solvent/air interface area, if the hoist speed exceeds 0.9 meters per minute (3 feet per minute). This determination shall be re-calculated if the parts or basket size increase.
 - c. The permittee shall conduct quarterly monitoring of the hoist speed.
 - d. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
- (6) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:
 - a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or
 - c. the primary condenser.Included in the record shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.
- (7) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
 - b. the date of installation for the solvent cleaning machine and all of its control devices; and

- c. records of the halogenated HAP trichloroethylene solvent content for each solvent used in the solvent cleaning machine.
- (8) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
- a. the results of the control device monitoring required in this permit;
 - b. information on the actions taken to comply with 40 CFR 63.463, including the control equipment, the required monitoring parameters, records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
 - c. estimates of the annual trichloroethylene consumption.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report:
- a. any deviations or exceedances from the from the applicable emissions limitations, control measures, operational restrictions, monitoring, recordkeeping and reporting requirements specified in this permit;
 - b. a signed statement, by the facility owner or his designee, stating that “all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard”; and
 - c. an estimate of solvent consumption during the reporting period and emissions of each HAP.

The annual PER shall satisfy the reporting requirements under 40 CFR 63.468(f).

- (3) The permittee shall submit a deviation or exceedance report on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the regulating agency of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:
- a. the emissions unit has demonstrated a full year of compliance without an exceedance;

- b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and
 - c. the regulating agency does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions.
- (4) Each exceedance report shall be submitted by the 30th day following the reporting period and shall contain the following information:
- a. if an exceedance has occurred, the standard, monitored parameter, emission limit, or other requirement that was exceeded; the reason for the exceedance; the actions taken to correct any future exceedance of the same limit or requirement; and the magnitude and duration of each exceedance;
 - b. action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
 - c. if no exceedance has occurred, a statement to that effect shall be submitted.
- (5) The permittee shall submit a quarterly deviation (excursion) report if:
- a. any deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. emissions of trichloroethylene (TCE) from this emissions unit shall not exceed 8.70 tons per year, based upon a rolling, 12-month summation of TCE emissions; and
 - ii. the maximum annual TCE usage shall not exceed 1,430 gallons based on a rolling, 12-month summation of TCE usage;
 - b. quarterly (or monthly) measurements and records are not maintained of the speed of the solvent cleaning machine's automated parts handling system, or if these measurements exceed 3.4 meters per minute (11 feet per minute);
 - c. the cover did not completely cover the cleaning machine openings, when containing the HAP solvent and during any idling or downtime mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements were being conducted; or if cracks, holes or other defects to the cover, were not repaired or the cover not replaced within 15 days of detection;
 - d. the temperature of the chilled air blanket, measured at its center, was greater than 30% of the solvent's boiling point and was not adjusted within 15 days of detection;
 - e. the freeboard ratio is not maintained at 1.0 or greater;

- f. any of the following control equipment is not repaired or replaced within 15 days of any malfunction, and/or the machine is not shut down until repaired:
 - i. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
 - ii. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and
 - iii. the primary condenser.

Included in the report shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

The quarterly deviation (excursion) reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the applicable emissions limitations/control measures in the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation:

8.70 tons VOC/yr

Applicable Compliance Method:

Compliance with the annual VOC limit shall be determined using the following calculation:

$$n \text{ gallons/yr} \times 12.17 \text{ lbs VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs} = \text{tons VOC/yr}$$

where:

n = annual gallons of solvent used – annual gallons of recovered waste solvent;
and

12.17 lbs VOC/gal = the maximum VOC content of solvent used.

- b. Emissions Limitation:

0.73 ton VOC/month

Applicable Compliance Method:

Compliance with the monthly VOC limit shall be determined using the following calculation:

$n \text{ gallons/month} \times 12.17 \text{ lbs VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs} = \text{tons VOC/month}$

where:

n = monthly gallons of solvent used – monthly gallons of recovered waste solvent; and

12.17 lbs VOC/gal = the maximum VOC content of solvent used.

c. Emissions Limitation:

8.70 tons TCE per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limit shall be determined by a summation of the actual monthly VOC emissions calculated in f)(1)b.

d. Emissions Limitation/Control Requirements:

The permittee has selected or has installed and shall employ Option 6, as the control combination required from Table 1, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, freeboard refrigeration device and freeboard ratio of 1, through compliance with the “Additional Terms and Conditions”, “Operational Restrictions”, and “Monitoring and Record keeping Requirements” and “Testing Requirement” sections of this permit.

e. Emissions Limitation/Control Requirements:

The chilled air blanket temperature measured at the center of the air blanket shall be no greater than 30% of the solvent’s boiling point.

Applicable Compliance Method:

The solvent’s boiling point shall be documented and, on a weekly basis, the permittee shall measure the temperature at the center of the air blanket during the idling mode using a thermometer or thermocouple.

f. Emissions Limitation/Control Requirements:

The freeboard ratio shall not be less than 1.0

Applicable Compliance Method:

The permittee shall measure and record the freeboard ratio before and after each solvent addition to assure compliance with the control requirement limitation.

g. Emissions Limitation/Control Requirements:

The hoist speed shall not exceed 3.4 meters per minute (11 feet per minute).

Applicable Compliance Method:

The permittee shall determine the hoist speed by measuring the time it takes for the hoist, part, or part basket to travel a measured distance, and at the frequency as required in the "Monitoring and Record keeping Requirements" section of this permit. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

g) Miscellaneous Requirements

- (1) In accordance with 40 CFR 63.469, upon written application, the Administrator (the appropriate District Office or local air agency) may approve the use of equipment or procedures after they have been satisfactorily demonstrated to be equivalent, in terms of reducing emissions of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform to the atmosphere, to those prescribed for compliance within a specified paragraph of this subpart. The application must contain a complete description of the equipment or procedure and the proposed equivalency testing procedure and the date, time, and location scheduled for the equivalency demonstration.